EPA United States Environmental Protection Agency

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Location County: Select	State District:	
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1	MI	MIK421958869	DETROIT MT ELLIOTT REAL ESTATE LLC	8600 MOUNT ELLIOTT	DETROIT	MI	WAYNE	H----	Y	N
2	MI	MID985601772	DETROIT SCHOOLS	18600 WADSWORTH ST	DETROIT	MI	WAYNE	-----	N	N
3	MI	MIK171488323	ST JEANS PROPERTIES	8600 E7 MILE RD	DETROIT	MI	WAYNE	H----	Y	N
4	MI	MIK194599101	WASTE FREE LLC	8600 EAST 7 MILE RD	DETROIT	MI	WAYNE	-----	N	N

Page: 1

URL: /rcrainfo/searches/search.jsp

MIK421 958869

SELF-IMPLEMENTING SITE CLEANUP
AND
DISPOSAL OF PCB REMEDIATION WASTE
DETROIT MT. ELLIOTT REAL ESTATE, LLC
EXISTING INDUSTRIAL BUILDING – FORMER WOOD BLOCK FLOOR AREA
8600-8650 MT. ELLIOTT STREET
DETROIT, WAYNE COUNTY, MICHIGAN

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604
MAIL CODE LU-9J

BY
McDOWELL & ASSOCIATES
21355 HATCHER AVENUE
FERNDALE, MICHIGAN 48220
Ph: (248) 399-2066
Fax: (248) 399-2157
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JUNE 1, 2011

McDowell & Associates
Geotechnical, Environmental & Hydrogeological Services • Materials Testing & Inspection
21355 Hatcher Avenue • Ferndale, MI 48220
Phone: (248) 399-2066 • Fax: (248) 399-2157
www.mcdowasc.com

June 1, 2011

U.S. Environmental Protection Agency (EPA)
77 West Jackson Boulevard
Chicago, Illinois 60604
Mail Code LU-9J

Job No. 09-14372

Attention: Mr. Peter Ramanauskas

Subject: Self-Implementing Site Cleanup and Disposal of PCB Remediation Waste
Detroit Mt. Elliott Real Estate, LLC
Existing Industrial Building – Former Wood Block Floor Area
8600-8650 Mt. Elliott Street
Detroit, Wayne County, Michigan

Dear Mr. Ramanauskas,

Pursuant to the request of Detroit Mt. Elliott Real Estate, McDowell & Associates has witnessed and verified a Self-Implemented On-Site Cleanup and Disposal of PCB Remediated Waste (the "Cleanup") for the subject property.

The Cleanup was completed in accordance with 40 CFR 761.61 (a)(3) and the "Cleanup Plan for Self-Implementing Site Cleanup and Disposal of PCB Remediation Waste" report submitted to the EPA by McDowell on May 20, 2010, with "Addendum No. 1" report dated November 17, 2010 and "Addendum No. 2" report dated January 3, 2011, both submitted to the EPA and approved (the "Plan"). USEPA correspondence is attached.

Copies of this report are also being submitted to the Michigan Department of Environmental Quality (MDEQ) and the Wayne County Environmental Health Department. Both departments were provided a copy of the Self-Implementing Cleanup Letter completed by McDowell & Associates on May 20, 2010. This report is intended to complete their file.

Background

The subject property consists of an approximate 313,000 square foot industrial building located at 8600-8650 Mt. Elliott Street in Detroit, Wayne County, Michigan. A Site Location Map, which shows the approximate location of the subject property, is included as Attachment I. A legal description for the subject property accompanies this letter as Attachment II.

The building on the subject property was originally constructed in 1925, with additions to the main structure in 1930, 1933, and 1937. Original use of the building was for automotive manufacturing and steel milling.

A former wood block floor was located in the original portion of the building, which was constructed in 1925 and is comprised of approximately 27,000 square feet. A Site Map, which shows the approximate location of the former wood block floor in relation to the entire building, accompanies this report.

Based on information provided to McDowell & Associates by Monarch Steel Company, who was the former owner of the property, polychlorinated biphenyls (PCBs) were reportedly detected in a wood chip sample obtained in 1987 from the former wood block floor at a concentration of 63 ppm. Great Lakes Environmental reportedly removed the wood block floor in May 1987 for off-site disposal. The concrete floor beneath the original wood block floor was reportedly cleaned. Wipe samples obtained by others following the floor cleaning reportedly did not show detectable concentrations of PCBs.

McDowell & Associates (McDowell) completed a Phase I ESA for the subject property on March 16, 2010. Small amounts of wood block floor remnants were observed during McDowell site visits in 2009 and 2010. These remnants were removed as part of the remedial process and disposed as part of the PCB waste.

A Phase II ESA was completed for the subject property by McDowell on March 16, 2010. As part of that investigation, McDowell obtained four wipe samples (W-1 through W-4) on May 29, 2009 from the former wood block floor area to investigate for residual PCB contamination from the former use. Results of the wipe samples showed PCBs were detected in each of the samples. The detected concentrations in W-3 and W-4 exceed the TSCA Regulatory Action Level of $10ug/100cm^2$.

In March 2010, McDowell obtained 34 additional wipe samples from the area of the former wood block floor to estimate the extent of concrete with elevated PCB levels. Results of the testing showed PCBs in 10 of the 34 samples, at concentrations above 10 $ug/100cm^2$.

In accordance with the Plan, a total of 15 concrete samples were obtained in the original grid areas determined by the wipe sampling to have elevated levels of PCBs, and in select grid areas around the area to delineate the required extent of cleanup. Samples were submitted for chemical analysis of PCBs, Method 8082. McDowell conducted a linear regression statistical analysis of the two sample test results (wipe samples vs. concrete samples), which showed a correlation coefficient (R^2) of 0.9683. Typically, R^2 values greater than 0.95 indicate correlation between two data sets at a 95% confidence level. Based on that information, a triangular area of PCB impact was delineated for cleanup.

Cleanup Plan Remediation Technique

Prior to start of the cleanup plan fieldwork, the triangular area determined to be impacted with PCBs was grided into 3 meter squares (10 feet), as approved and described in the Plan and following 24 CFR Subpart N, 761.265. A total of 132 three-meter grids were plotted over the remediation area. Discrete concrete samples were obtained at the grid locations (where the lines intersected versus the middle of the 3 meter grid square) following the U.S. EPA "Draft Standard Operating Procedure for Sampling Concrete in the Field", dated 12/20/97.

As presented in the Plan, the cleanup method at the site consisted of removal of concrete by mechanical means to a depth required to meet the criteria for "low occupancy space." Approximately 1/8 inch to ¼ inch of the concrete surface was removed by Environmental Specialty Services (ESS) using an abrasive machine. The waste was collected by the machine via a high-efficiency particulate air (HEPA) vacuum and stored in the self-contained container. Once the container became full, the concrete waste was placed in labeled 55-gallon drums. Each phase of work where removal took place was labeled a "Pass". A total of seven passes were completed within the area of remediation. Confirmatory sampling and testing was completed after each Pass to determine the extent of residual elevated PCBs following the approach approved in the Plan. McDowell witnessed the work completed on-site by Environmental Specialty Services on behalf of Detroit Mt. Elliott Real Estate, LLC.

Cleanup Plan Chemical Testing Program

Following 40 CFR 761.61, samples of concrete were obtained using a 1" diameter drill bit to a depth of ½ inch below concrete surface. Two drill holes were completed at each verification sampling location to ensure enough material was obtained for the analytical laboratory, per rule 761.286. The drill bit was cleaned between sampling locations using a stiff wire brush followed by an alconox solution. All samples obtained as part of this cleanup plan were placed in labeled, pre-cleaned glass jars and stored in an ice-chest until delivery to a representative of Brighton Analytical, LLC of Brighton, Michigan for chemical testing. Sample chain-of-custody documentation accompanies this report along with the chemical test results.

Concrete verification samples obtained were subjected to tests to determine the presence of PCBs, Method 8082, following method 761.61(6)(i). Duplicate samples were obtained for QA/QC purposes.

Concrete waste characterization samples (Pass samples) were subjected to tests to determine the presence of PCBs, Method 8082, extraction method 3550B. The extraction method follows 761.61(a)(5)(i)(B) for bulk PCB remediation waste intended for off-site disposal.

Cleanup Plan Analytical Test Results and Maps

Attached to this report are several maps which show the plotted grid areas of exceedance, following each remediation pass. Also attached to this report are analytical chemistry tables, comparing results to both the TSCA, Subpart D level for Industrial and Commercial II sites and the Michigan Department of Environmental Quality (MDEQ) Part 201 Cleanup Criterion for Industrial & Commercial II sites. Colors in analytical chemistry tables correlate with the accompanying maps.

Each remediation Pass 1 through 7 is shown on the attached maps. Passes 1 and 2 were based on the initial PCB wipe and concrete sample exceedances analytical results. Subsequent pass remediation areas were based on the verification sampling results. Sample locations following a subsequent pass were based on the rules set forth in 761.283.

Field Work

PASS 1 & PASS 2

From November 29, 2010 through December 2, 2010, the entire triangular area of impact was remediated by mechanical means. Concrete waste obtained during Pass 1 was placed in labeled 55-gallon drums. A second pass (Pass 2) was then completed on the southern portion of the triangular area. This portion of the triangular area was determined to have higher levels of PCBs following both the wipe samples and discrete concrete samples obtained on November 1, 2010 and was therefore remediated to a greater depth. (Refer to Map "Initial PCB Wipe & Concrete Sample Exceedance Map.") Concrete waste obtained during Pass 2 was also placed in labeled 55-gallon drums.

On December 6, 2010, following Pass 1 and Pass 2, a total of 132 discrete concrete samples were obtained for analytical chemistry testing. Nine of the samples were obtained 10 foot south of the original delineated triangular area of impact. An interior brick wall was originally located along the south boundary of the triangular area of impact. Following the initial wipe sampling, that wall was subsequently demolished as part of site renovation activities. Therefore, to ensure proper cleanup boundaries, McDowell extended the area of verification sampling 10' south of the original southern boundary. As this area was beyond a former interior brick wall, samples were obtained in 20' intervals in an E-W direction as shown on the accompanying Sample Location Maps.

Results of the analytical testing identified PCBs in 28 grid locations above the TSCA, Subpart D Cleanup Standards for Industrial & Commercial II criteria. A map showing the locations of the elevated grids is included as "PCB Concrete Verification Sampling Location Map After Pass 1 & Pass 2".

PASS 3

During the week of December 20, 2010, additional remediation by mechanical means was completed in the area of the 28 grids that had elevated levels of PCBs, following verification sampling. The delineated area had a 10-foot buffer to ensure proper cleanup coverage. Waste obtained during Pass 3 was placed in labeled 55-gallon drums.

On December 27, 2010, a total of 36 samples were obtained from the subject property and submitted for analytical chemistry testing. Samples obtained were those grid areas shown to have elevated levels of PCBs after Passes 1 and 2, along with samples 124.5, 125.5, 126.5, 127.5, 128.5, 129.5, 130.5, and 131.5. Three of the verification samples obtained south of the original triangular area (beyond the former interior brick wall), were shown to have elevated levels of PCBs, McDowell chose to sample those 10' grid intervals in between the initial 20' grids, to ensure proper boundary verification sampling of the area of impact.

Results of the analytical testing identified 10 grid locations having PCBs above the TSCA, Subpart D Cleanup Standards for Industrial & Commercial II criteria. A map showing the locations of the elevated grids is included as "PCB Concrete Verification Sampling Location Map After Pass 3".

PASS 4

During the week of January 10, 2011, additional remediation by mechanical means was completed in the area of the 10 grids that had elevated levels of PCBs, following verification sampling. The delineated area had a 10-foot buffer to ensure proper cleanup coverage. Waste obtained during Pass 4 was placed in labeled 55-gallon drums.

On January 13, 2011, the 10 grid locations that had elevated levels of PCBs were sampled. A total of 10 samples were obtained.

Results of the analytical testing identified PCBs at 5 grid locations above the TSCA, Subpart D Cleanup Standards for Industrial & Commercial II criteria. A map showing the locations of the elevated grids is included as "PCB Concrete Verification Sampling Location Map After Pass 4".

Note that in grid number 98, the Pass was completed at an approximate ½ inch to 1" depth.

PASS 5

During the week of January 24, 2011, additional remediation by mechanical means was completed in the area of the 5 grid locations that had elevated levels of PCBs, following the last round of verification sampling. The delineated area had a 10-foot buffer to ensure proper cleanup coverage. In addition, grid 98 was added in this cleanup to ensure proper depth of the entire grid. Concrete waste generated during this remediation pass was placed in labeled 55-gallon drums.

On January 26, 2011, six samples were obtained from the area of cleanup, which included Grid 98. Results of the analytical testing identified three grids with elevated levels of PCBs, above the TSCA, Subpart D Cleanup Standard for Industrial & Commercial II criteria. A map showing the locations of the elevated grids is included as "PCB Concrete Verification Sampling Location Map After Pass 5".

PASS 6

During the week of February 7, 2011, the three grids that were determined to have elevated levels of PCBs were remediated by mechanical means, removing approximately ½ inch of concrete. The delineated area had a 10-foot buffer to ensure proper cleanup coverage. All concrete waste generated was placed in labeled 55-gallon drums.

On February 7, 2011, the three grid locations were sampled. Results of the analytical testing identified two grid locations with elevated levels of PCBs, above the TSCA, Subpart D Cleanup Standard for Industrial & Commercial II criteria. A map showing the locations of the elevated grids is included as "PCB Concrete Verification Sampling Location Map After Pass 6".

PASS 7

During the week of February 21, 2011, the two grids that were determined to have elevated levels of PCBs were remediated by mechanical means, removing an additional approximate ½ inch of concrete. The delineated area had a 10-foot buffer to ensure proper cleanup coverage. All concrete waste generated was placed in labeled 55-gallon drums.

On March 8, 2011, the two grid locations were sampled. Results of the analytical testing did not identify elevated levels of PCBs within those two grid locations.

After completion of seven passes, it was determined through multiple sampling events that the original area of PCB impact was remediated to levels below TSCA and MDEQ Part 201 Industrial & Commercial II cleanup standards and no further remediation of the concrete floor by mechanical means was required.

Waste Characterization for Off-Site Disposal

A total of seven passes were completed on the subject property, within the area of PCB contamination. At the completion of each pass, a composite sample of the waste generated was obtained following the method outlined in 761.289. Samples collected were placed in labeled, pre-cleaned glass jars and submitted to Brighton Analytical for chemical testing. All chemical test results indicate the bulk PCB remediation waste to be at concentrations less than 50 ppm, with the exception of Pass 7. A total of 19 55-gallon drums of waste was generated, with two of the drums containing waste from Pass 7. Based on the analytical in-situ results and the analytical results of the waste material, all waste was required to be disposed of in accordance with 761.61 (a)(5)(v)(A) as a hazardous waste.

A request to dispose of the 55-gallon drums, along with the maximum concentration of PCBs identified within the waste, was submitted to the disposal facility and transporter in writing by McDowell 15 days prior to disposal. This request and approval is required prior to removing the drums off-site pursuant to 761.61(a)(5)(i)(B)(2)(iv).

Waste was disposed off-site in containers meeting the requirements of the DOT Hazardous Materials Regulations at 49 CFR parts 171 through 180. Waste was disposed of at EQ's disposal facility, known as Wayne Disposal, Inc. of Belleville, Michigan, an approved disposal facility as required in 761.61 (a)(5)(v)(A). All 19 drums of waste were disposed off-site on May 15, 2011. A copy of the waste manifest is appended to this report. Detroit Mt. Elliot Real Estate, LLC utilized a licensed hazardous waste transporter (HM Environmental) for the waste disposal. Their qualifications can be viewed at www.hmenvironmental.com.

Future Use of the Remediated Area

Detroit Mt. Elliott Real Estate, LLC intends to utilize the remediated area for storage of metal ingots for the London Metals Exchange. Metal ingots are currently being stored in other portions of the building, and are stored in stacks until delivery to a distributor. According to 761.3, the definition of "low occupancy use" is as follows:

> "Low occupancy area means any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: less than 840 hours (an average of 16.8 hours per week) for non-porous surfaces and less than 335 hours (an average of 6.7 hours per week) for bulk PCB remediation waste. Examples could include an electrical substation or a location in an industrial facility where a worker spends small amounts of time per week (such as an unoccupied area outside a building, an electrical equipment vault, or in the non-office space in a warehouse where occupancy is transitory.)"

The approximate 313,000 square-foot warehouse is infrequently staffed, generally having less than ten employees on-site at one time. Employees will spend less than an average of 6.7 hours per week in the remediated area, using the area more in transitory occupancy, during the stacking or loading of metal ingots. This future employee use on the property meets the definition of "low occupancy use". Additionally, the definition assumes PCB remediation waste will be disposed of on-site. For this property, waste generated during the remediation will be properly disposed off-site. Finally, grid intervals were repeatedly sampled until all sampling resulted in PCB verification sampling levels of less than the TSCA, Subpart D Cleanup Standards for Industrial & Commercial II level of 1,000 ug/Kg (uncapped value), which is the most stringent criteria (as compared to MDEQ Part 201 Generic Industrial & Commercial II cleanup criteria).

Schedule Adjustment

As outlined in the Plan, the PCB remediation waste would be disposed off-site prior to submittal of the final "Self- Implementing Site Cleanup" report to the EPA. Due to the unforeseen vertical extent of PCB contamination, and the desire to fully remediate the property, the original schedule in the plan could not be followed. Therefore, Mr. Juan Thomas of the USEPA was notified of the delay and kept updated of proposed disposal dates. This approach was approved by the USEPA.

While awaiting disposal, all 55-gallon drums on the property containing remediation waste were labeled as PCB containing and sealed. Drums were stored in a location that is not frequented, so as to minimize potential contact with the drums.

Conclusions

Detroit Mt. Elliott Real Estate, LLC has completed a Self-Implementing Site Cleanup for a portion of an existing industrial building located at 8600-8650 Mt. Elliott Street, Detroit, Wayne County, Michigan. This clean-up has remediated the former wood block floor area to levels below the most stringent criteria, and meeting the definition of the "low occupancy area". The Self-Implementing Site Cleanup followed those guidelines set forth in the two McDowell reports, "Cleanup Plan for Self-Implementing Site Cleanup and Disposal of PCB Remediation Waste", dated May 20, 2010, and the "Addendum No. 1 PCB Self-Implementing Site Cleanup Plan", dated November 17, 2010, both of which were approved by the U.S. EPA.

This self-implementing cleanup by Detroit Mt. Elliott Real Estate, LLC improved both the environmental and health safety of the building on the subject property allowing for increased commerce and employment in an otherwise depressed area of Detroit, Michigan. This cleanup also allowed for improved future use of the property.

Should you have any questions regarding the information contained within this plan, please do not hesitate to contact us.

Very truly yours,

McDOWELL & ASSOCIATES

Christine VanDellen
Environmental Scientist

Douglas M. McDowell, M.S., P.E.
Environmental Manager

Certification

In accordance with 40 CFR 761.61(a)(3)(E), Detroit Mt. Elliott Real Estate, LLC (current owner of the subject property and the party conducting the cleanup) and McDowell & Associates (environmental consultant for Detroit Mt. Elliott Real Estate, LLC) certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file at McDowell & Associates' Ferndale office, and are available for U.S. EPA inspection.

Detroit Mt. Elliott Real Estate, LLC

Curt Felch

McDOWELL & ASSOCIATES

Douglas M. McDowell, M.S., P.E.

CVD/cvd/def/jb/ks

cc: Michigan Department of Environmental Quality
Wayne County Environmental Health Department

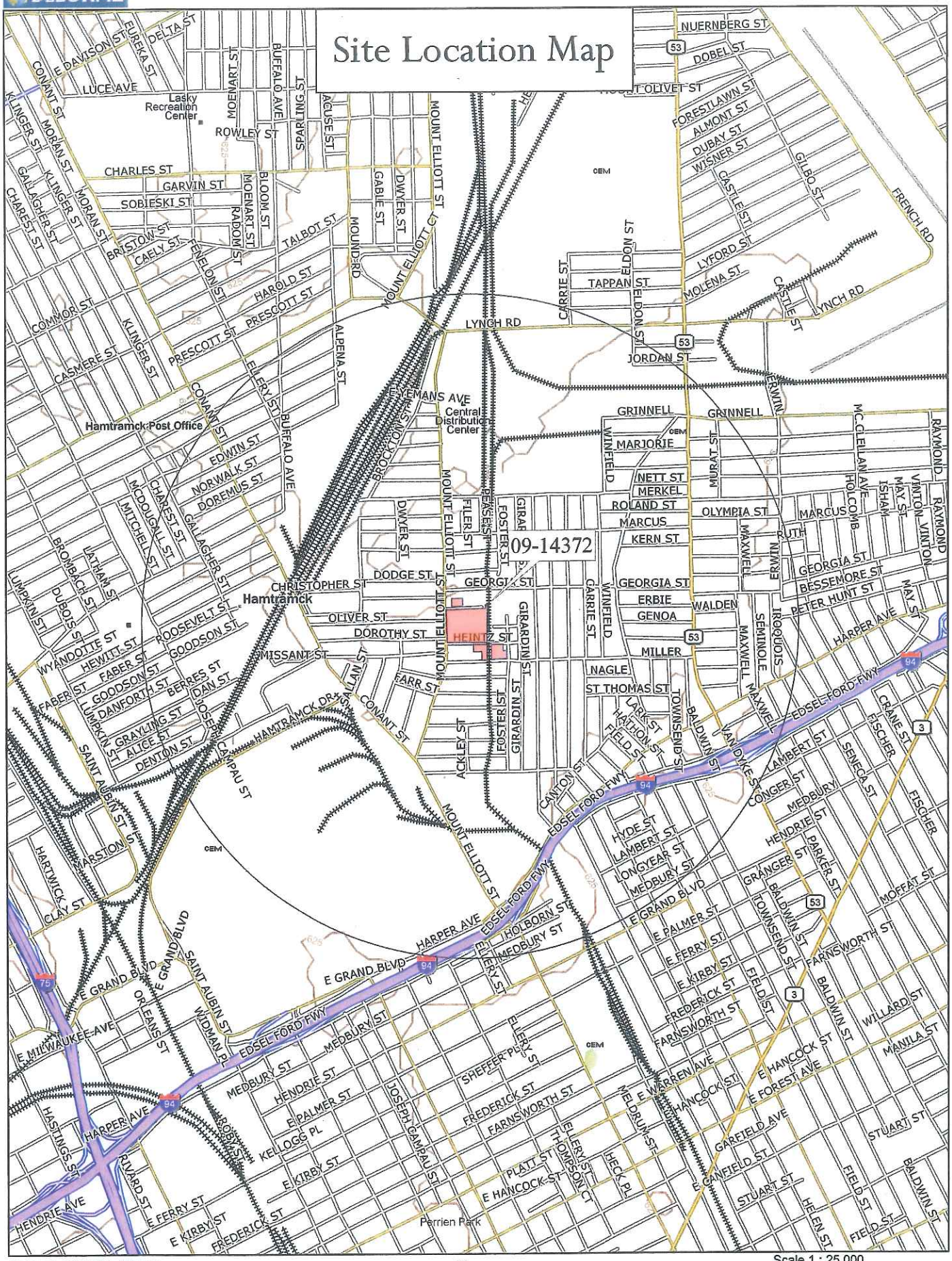
Attachments:

Attachment I – Site Location Map
Attachment II – Legal Description of Subject Property
Attachment III – Approximate PCB Cleanup Location in Relation to Entire Subject Property
Attachment IV – PCB Concrete Verification Sampling Maps
Attachment V – PCB Analytical Table
Attachment VI – Waste Manifest
Attachment VII – U.S. EPA Self-Implementing Cleanup Approval Letter
Attachment VIII – McDowell & Associates Self-Implementing Cleanup Letter with Addendum No. 1 and Addendum No. 2
Attachment IX – Analytical Chemistry Results with Chain-of-Custody
Attachment X – Résumés

Attachment I –

Site Location Map

Site Location Map



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TN

MN (7.4°W)

Scale 1 : 25,000

0 600 1200 1800 2400 3000 ft

0 200 400 600 800 1000 m

1" = 2,083.3 ft

Data Zoom 13-0

Attachment II –

Legal Description of Subject Property

Exhibit A
Legal Description

Commitment No.: 11331

Land situated in the City of Detroit, County of Wayne, State of Michigan, described as follows:

Parcel 1

Lots 1 to 19, both inclusive of HOWE'S SUBDIVISION of part of the East 1/2 of the Southwest 1/4 of Section 21, Town 1 South, Range 12 East, being the South part of Outlot 6 of the J. Dunn Farm, Detroit, Michigan, as recorded in Liber 13 of Plats, page 24, Wayne County Records, together with the vacated alleys lying in the rear of said lots, and all that part of Newhall Street lying Easterly of Mt. Elliott Avenue, beginning at a point, said point being 7.45 feet Northerly along the Easterly line of Mt. Elliott Avenue extended from the Northwest corner of Lot 4 of HOWE'S SUBDIVISION, thence South 0 degrees 13 minutes West 7.45 feet to the Northwest corner of Lot 4 heretofore mentioned; thence North 89 degrees 43 minutes East 279.79 feet to a point; thence in a Westerly direction 279.75 feet to the point of Point of Beginning, also that part of Section 21, Town 1 South, Range 12 East, described as follows: Beginning at the intersection of the Easterly line of Mt. Elliott Avenue and Southerly line of Section 21; thence along the Easterly line of Mt. Elliott Avenue, North degrees 52 minutes East 328.54 feet to the Southerly line of HOWE'S SUBDIVISION; thence along the Southerly line of HOWE'S SUBDIVISION, North 89 degrees 13 minutes East 598.20 feet to the Westerly line of the Michgian Central Railroad Right-of-Way; thence along said Westerly Right-of-Way line South 0 degrees 1 minutes West 344.50 feet to the Northerly line of CHARLES HEINTZ SUBDIVISION; thence along said Northerly line of CHARLES HEINTZ SUBDIVISION, North 89 degrees 16 minutes West 603.22 feet to the Point of Beginning.
ALSO
Lot 8 and Lots 43 to 58, both inclusive, CHARLES HEINTZ SUBDIVISION of part of the Southeast 1/4 of the Southwest 1/4 of Section 21, Town 1 South, Range 12 East, Hamtramck Township, Wayne County, Michigan, as recorded in Liber 29 of Plats, page 6, Wayne County Records, also All of that property lying East and in the rear of Lot 8 and West of Lot 43 of the above described CHARLES HEINTZ SUBDIVISION, said premises being 18 feet by 30 feet. All of said above described premises being bound on the West by Mt. Elliottt Avenue on the South by Heintz Avenue, on the East by the Michigan Central Railroad Right-of-Way and on the North by Newhall Street as constituted after vacation of a portion of Newhall Street by proceedings of the Common Council of the City of Detroit, held April 9, 1935, also all that part of Newhall Street East of Mt. Elliott Avenue lying North of and adjoining the North line of Lot 19 and South of and adjoining the South line of Lot 22 of the aforesaid HOWE'S SUBDIVISION vacated by resolution of the Common Council of the City of Detroit which resolution is recorded in Volume 14306, page 590, Wayne County Records.

Commonly Known As: 8600 Mt. Elliott
Parcel No. Ward 15, Item 014189

Parcel 2

Lot 36, Except the East 6 feet of the North 30 feet and the West 3 feet of the South 80 feet of Lot 35, HOWE'S SUBDIVISION, as recorded in Liber 13, page 24 of Plats, Wayne County Records.

Commonly Known As: 6331 Newhall
Parcel No. Ward 15, Item 001684

Parcel 3

The West 15 feet of Lots 21 and 60, and the vacated alley adjacent thereto, HOWE'S SUBDIVISION, as recorded in Liber 13, page 24 of Plats, Wayne County Records.

Commonly Known As: 6409 Newhall
Parcel No. Ward 15, Item 001676.001

Parcel 4

The East 6 feet of the North 30 feet of Lot 36, Lot 35 Except the West 3 feet of the South 80 feet and Part of Lot 34, beginning West 14.70 feet on the South line and West 13.60 feet on the North line, HOWE'S SUBDIVISION, as recorded in Liber 13, page 24 of Plats, Wayne County Records.

Commonly Known As: 6337 Newhall
Parcel No. Ward 15, Item 001665

Parcel 5

Part of Lot 34, beginning East 15.30 feet on the South line and East 16.20 feet of the North line and Part of Lot 33 beginning West 15.30 feet on the South line and West 13.60 feet on the North line, HOWE'S SUBDIVISION, as recorded in Liber 13, page 24 of Plats, Wayne County Records.

Commonly Known As: 6349 Newhall
Parcel No. Ward 15, Item 001666

Parcel 6

Lots 58 and 59 and the North 10 feet of the vacated alley adjacent thereto, HOWE'S SUBDIVISION, as recorded in Liber 13, page 24 of Plats, Wayne County Records.

Commonly Known As: 6412 Georgia
Parcel No. Ward 15, Item 001718-20

Parcel 7

Lots 22 and 23 and the South 10 feet of the vacated alley thereto and the North 30 feet of vacated Newhall adjacent thereto, HOWE'S SUBDIVISION, as recorded in Liber 13, page 24 of Plats, Wayne County Records.

Commonly Known As: 6411 Newhall
Parcel No. Ward 15, Item 001675

Parcel 8

The East 12 feet of Lots 22, 23 and 24, Lots 27 and 28 and the East 12 feet of Lot 29, and the vacated alley adjacent thereto, CHARLES HEINTZ SUBDIVISION, as recorded in Liber 29, page 5 of Plats, Wayne County Records.

Commonly Known As: 6425 Miller
Parcel No. Ward 15, Item 001371

Parcel 9

Lot 33, CHARLES HEINTZ SUBDIVISION, as recorded in Liber 29, page 5 of Plats, Wayne County Records.

Commonly Known As: 6380 Heintz
Parcel No. Ward 15, Item 001620

Parcel 10

Lot 32, CHARLES HEINTZ SUBDIVISION, as recorded in Liber 29, page 5 of Plats, Wayne County Records.

Commonly Known As: 6356 Heintz
Parcel No. Ward 15, Item 001619

Parcel 11

Lots 30 and 31, CHARLES HEINTZ SUBDIVISION, as recorded in Liber 29, page 5 of Plats, Wayne County Records.

Commonly Known As: 6398 Heintz
Parcel No. Ward 15, Item 001618

Parcel 12

Lots 3 thru 10, both inclusive and Lots 12 thru 18, both inclusive, and vacated alley adjacent thereto, MT. ELLIOTT HEIGHTS SUBDIVISION, as recorded in Liber 30, page 82 of Plats, Wayne County Records.

Commonly Known As: 6445 Miller
Parcel No. Ward 15, Item 001373

Parcel 13

Lot 23, MT. ELLIOTT HEIGHTS SUBDIVISION, as recorded in Liber 30, page 82 of Plats, Wayne County Records.

Commonly Known As: 6441 Heintz
Parcel No. Ward 15, Item 001631

Parcel 14

Lot 160, HEINTZ SUBDIVISION, as recorded in Liber 35, page 53 of Plats, Wayne County Records.

Commonly Known As: 8605 Mt. Elliott
Parcel No. Ward 13, Item 009663

Parcel 15

Lot 163, HEINTZ SUBDIVISION, as recorded in Liber 35, page 53 of Plats, Wayne County Records.

Commonly Known As: 8619 Mt. Elliott
Parcel No. Ward 13, Item 009660

Parcel 16

Lot 162 HEINTZ SUBDIVISION, as recorded in Liber 35, page 53 of Plats, Wayne County Records.

Commonly Known As: 8615 Mt. Elliott
Parcel No. Ward 13, Item 009661

Parcel 17

Lots 3 and 4 KRAUSES SUBDIVISION, as recorded in Liber 26, page 32 of Plats, Wayne County Records.

Commonly Known As: 8711 Mt. Elliott
Parcel No. Ward 13, Item 009665

Parcel 18

Beginning at a point on the West line of The Michigan Central Railroad Company which is South 122.68 feet along the centerline of the near railroad track and West 24.10 feet from the intersection of the centerline of Newhall Street and said Railroad track; thence South 60 degrees 27 minutes 42 seconds East 17.47 feet along the side track doors of the U.S. Equipment Co. Building; thence South 17 degrees 13 minutes 31 seconds West 53.42 feet along the Southeasterly face of said building; thence North 00 degrees 35 minutes 44 seconds East 59.64 feet to the Point of Beginning.

Commonly Known As: 8730 Mt. Elliott
Parcel No. Ward 15, Item 014190.001

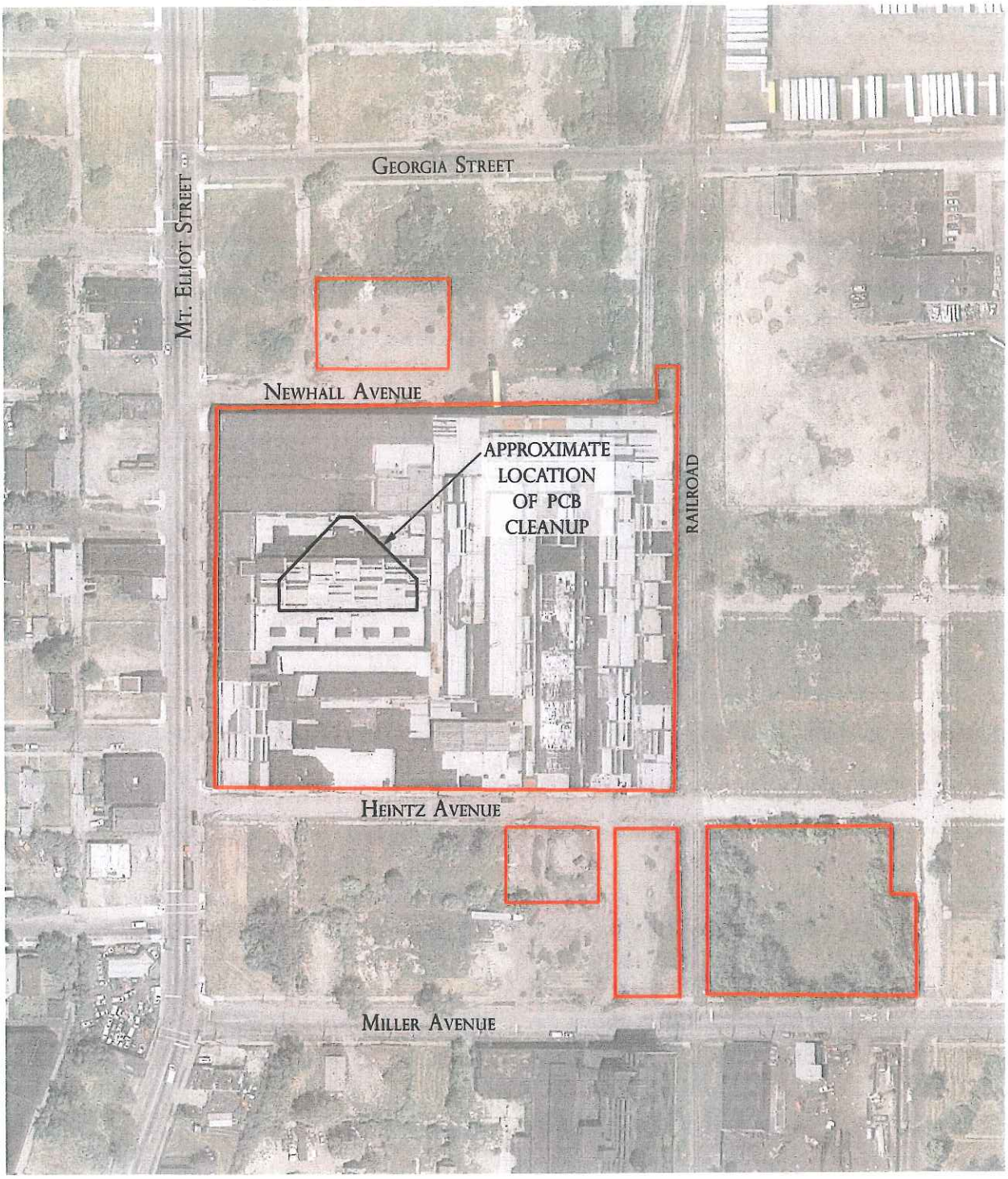
Attachment III –

Approximate PCB Cleanup Location in Relation to Entire Subject Property

McDowell & Associates

JOB NUMBER: 09-14372

APPROXIMATE PCB CLEANUP LOCATION IN RELATION TO SUBJECT PROPERTY



2007 AERIAL PHOTOGRAPH

N

APPROXIMATE PROPERTY BOUNDARY

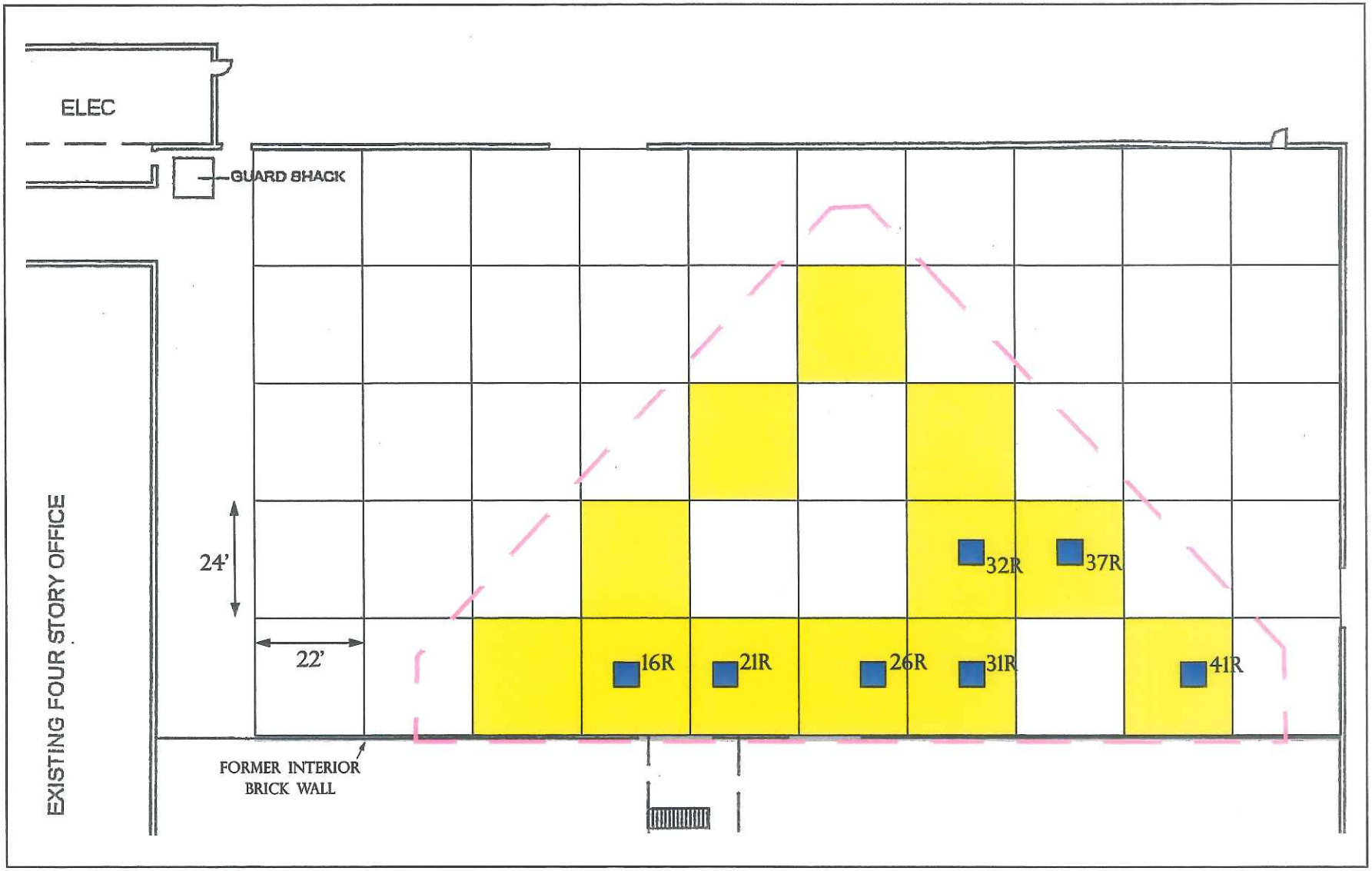
Attachment IV –

PCB Concrete Verification Sampling Maps

McDowell & Associates

JOB NUMBER: 09-14372

INITIAL PCB WIPE & CONCRETE SAMPLE EXCEEDANCE MAP



LEGEND:

= CONCRETE SAMPLE EXCEEDANCES FROM 11/1/10

= PCB WIPE SAMPLE EXCEEDANCES

= RECOMMENDED REMEDIAL AREA ~ 9500 SQFT.

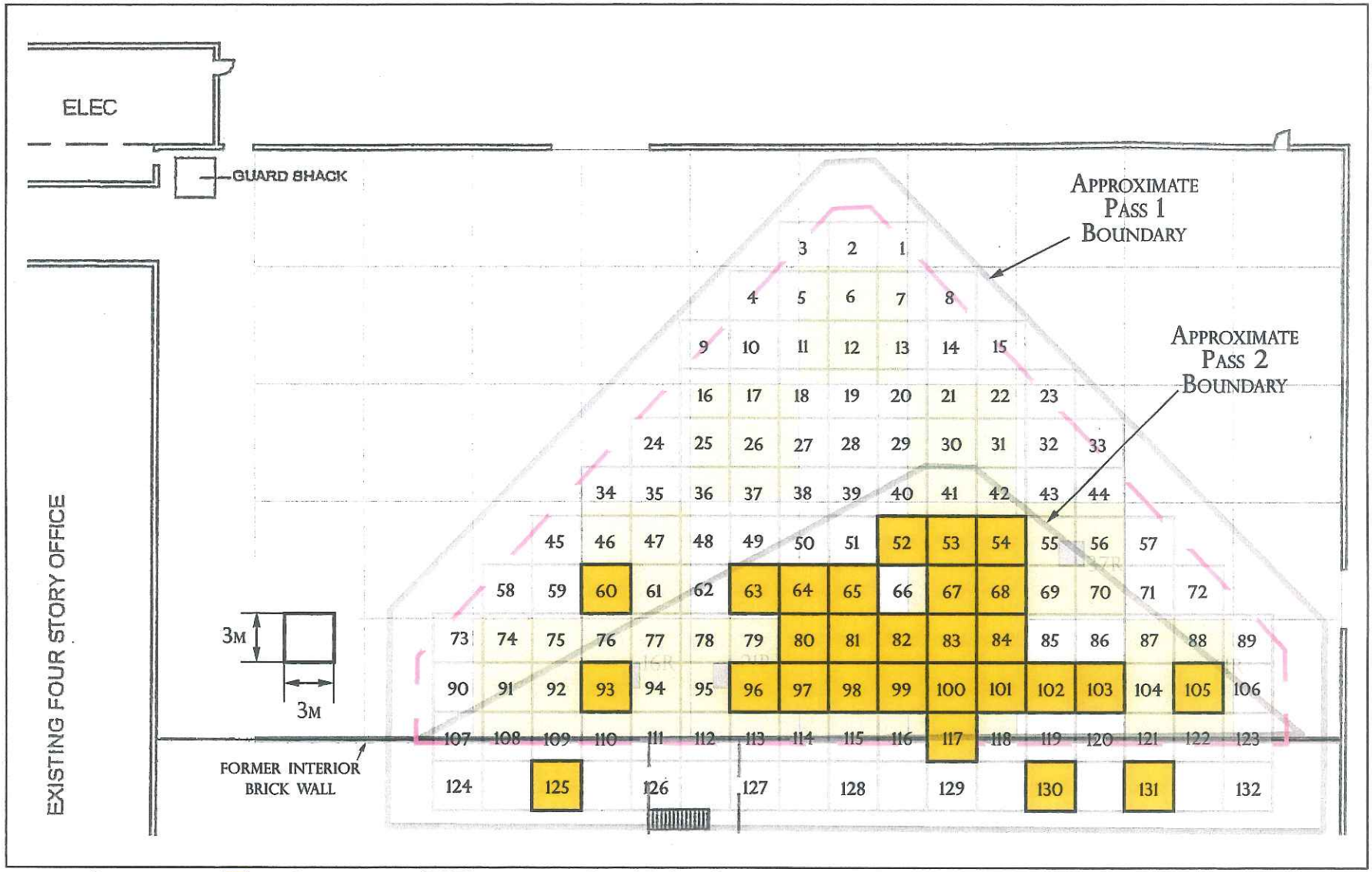
N

1" = 30'

McDowell & Associates

JOB NUMBER: 09-14372

PCB CONCRETE VERIFICATION SAMPLE LOCATION MAP AFTER PASS 1 & PASS 2



LEGEND:

= EXCEEDANCE OF TSCA LEVEL AFTER PASS 1 & PASS 2

= CONCRETE SAMPLE EXCEEDANCES FROM 11/1/10

= PCB WIPE SAMPLE EXCEEDANCES

= RECOMMENDED REMEDIAL AREA ~9500 SQFT.

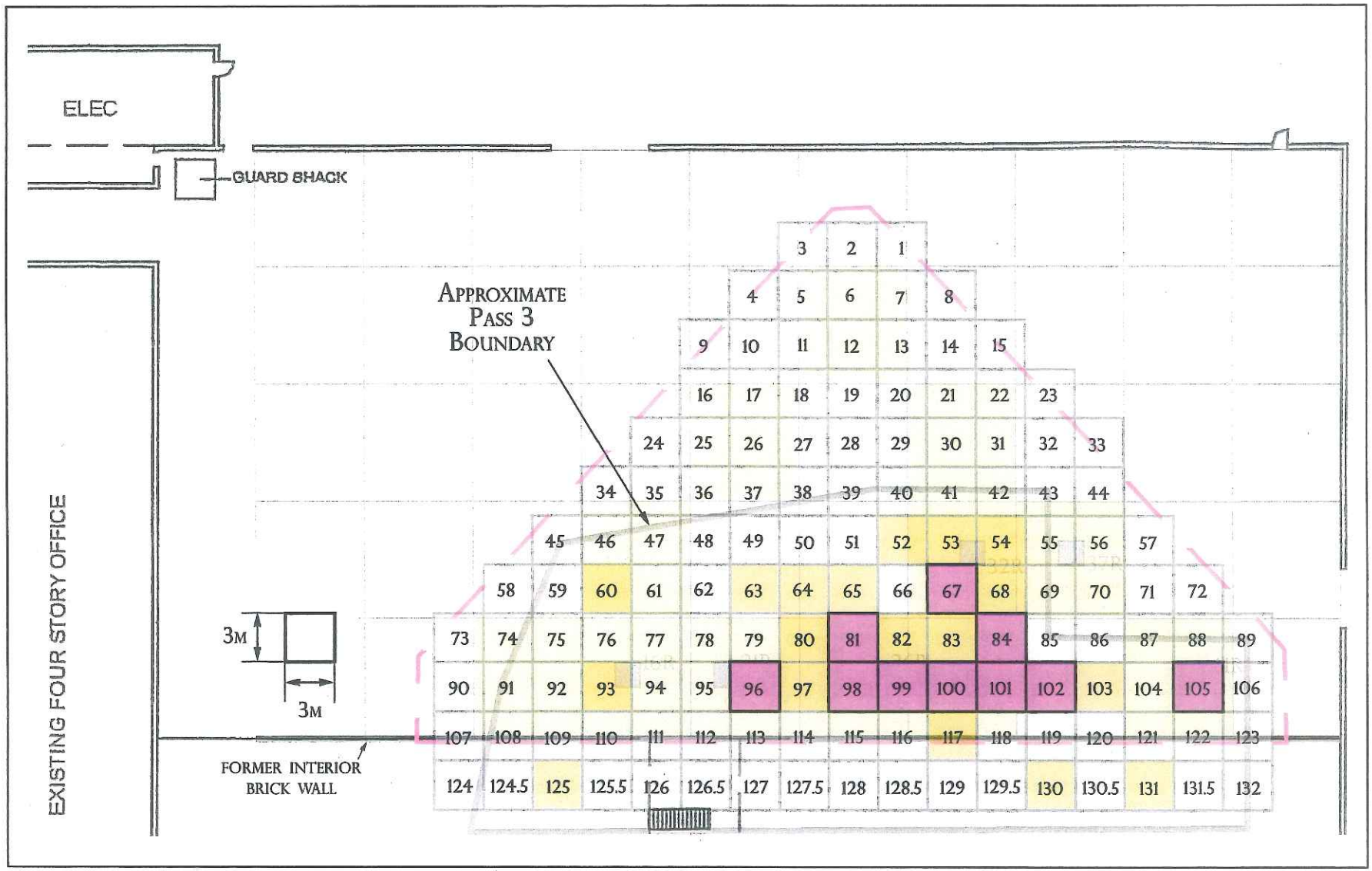
N

1" = 30'

McDowell & Associates

JOB NUMBER: 09-14372

PCB CONCRETE VERIFICATION SAMPLE LOCATION MAP AFTER PASS 3



LEGEND:

- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 3
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 1 & PASS 2
- = CONCRETE SAMPLE EXCEEDANCES FROM 11/1/10
- = PCB WIPE SAMPLE EXCEEDANCES
- = RECOMMENDED REMEDIAL AREA ~9500 SQFT.

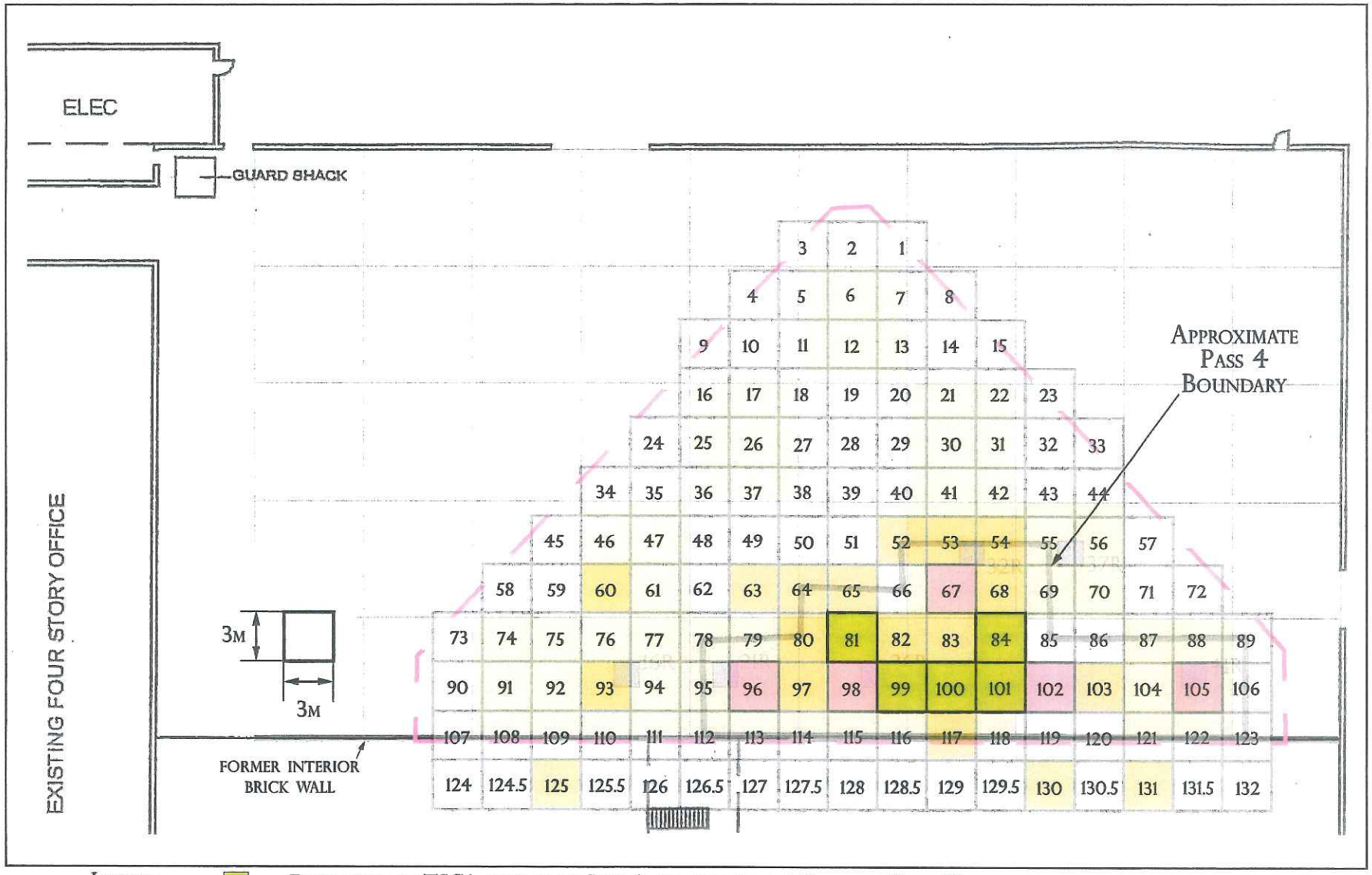
N

1" = 30'

McDowell & Associates

JOB NUMBER: 09-14372

PCB CONCRETE VERIFICATION SAMPLE LOCATION MAP AFTER PASS 4



LEGEND:

- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 4 AND APPROXIMATE 1" CUT AT GRID 98
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 3
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 1 & PASS 2
- = CONCRETE SAMPLE EXCEEDANCES FROM 11/1/10
- = PCB WIPE SAMPLE EXCEEDANCES
- = RECOMMENDED REMEDIAL AREA ~9500 SQFT.

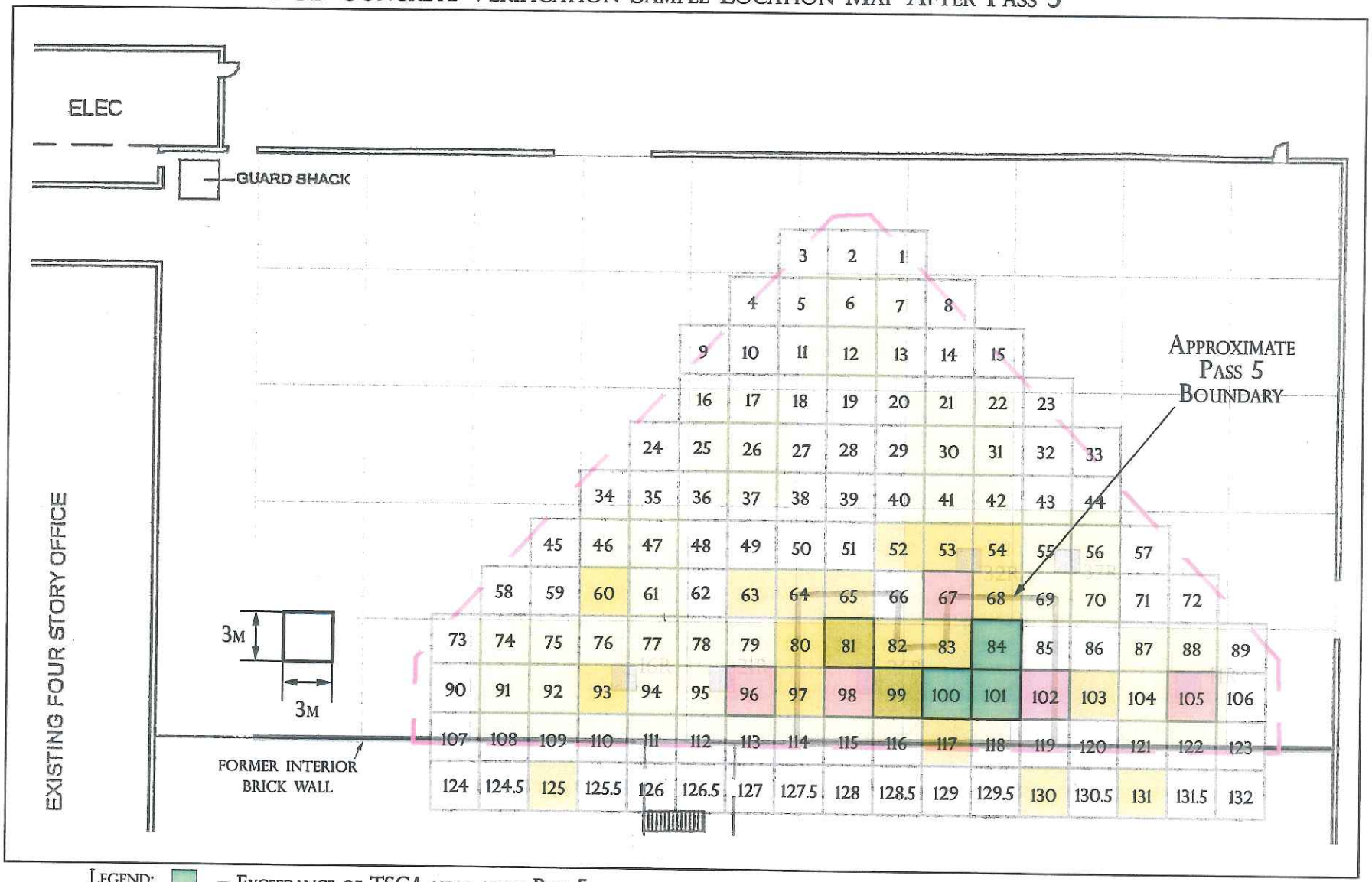
N

1" = 30'

McDowell & Associates

JOB NUMBER: 09-14372

PCB CONCRETE VERIFICATION SAMPLE LOCATION MAP AFTER PASS 5



LEGEND:

- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 5
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 4 AND APPROXIMATE 1" CUT AT GRID 98
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 3
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 1 & PASS 2
- = CONCRETE SAMPLE EXCEEDANCES FROM 11/1/10
- = PCB WIPE SAMPLE EXCEEDANCES
- = RECOMMENDED REMEDIAL AREA ~9500 SQFT.

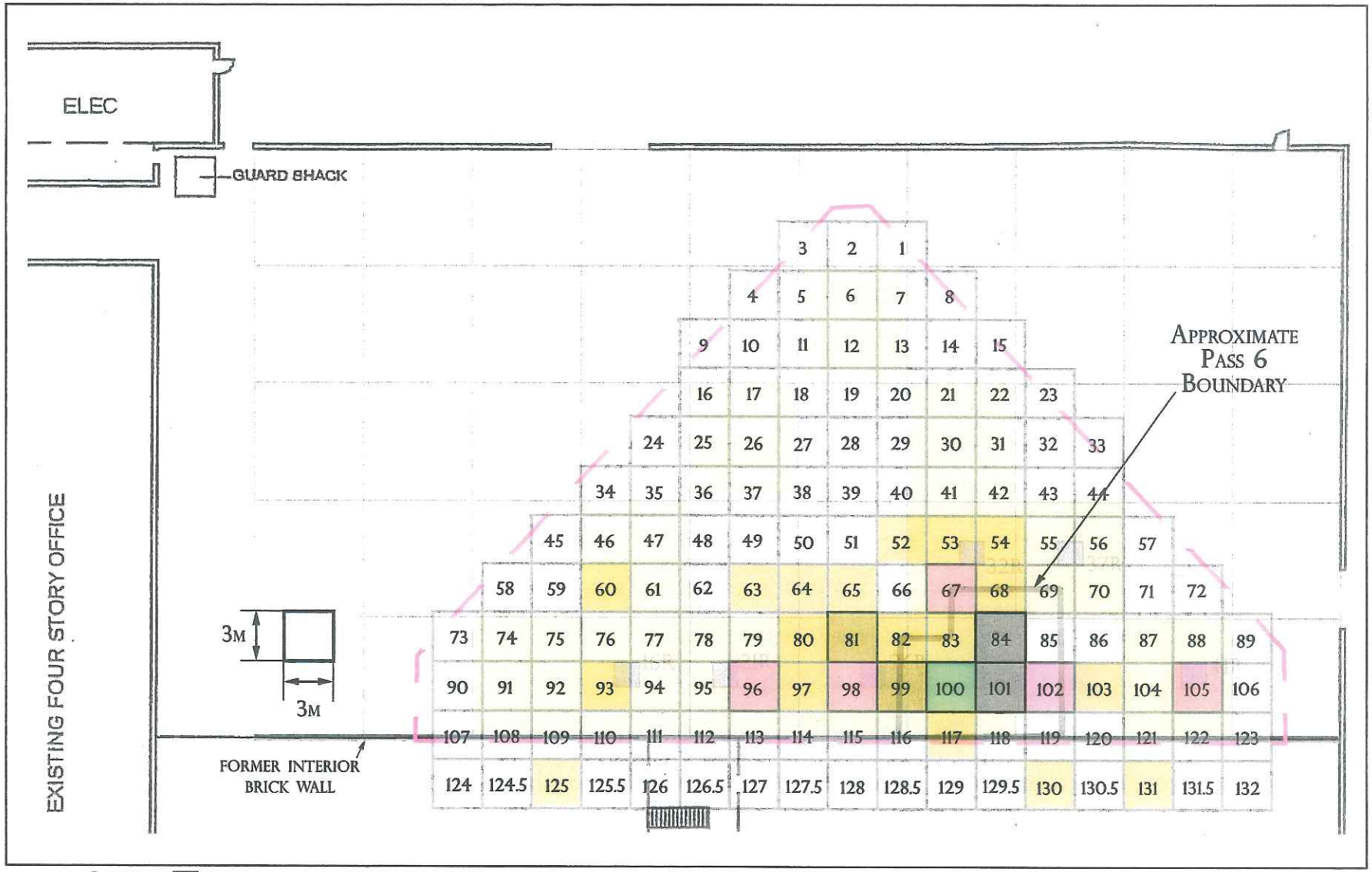
N

1" = 30'

McDowell & Associates

JOB NUMBER: 09-14372

PCB CONCRETE VERIFICATION SAMPLE LOCATION MAP AFTER PASS 6



LEGEND:

- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 6
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 5
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 4 AND APPROXIMATE 1" CUT AT GRID 98
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 3
- = EXCEEDANCE OF TSCA LEVEL AFTER PASS 1 & PASS 2
- = CONCRETE SAMPLE EXCEEDANCES FROM 11/1/10
- = PCB WIPE SAMPLE EXCEEDANCES
- = RECOMMENDED REMEDIAL AREA ~ 9500 SQFT.

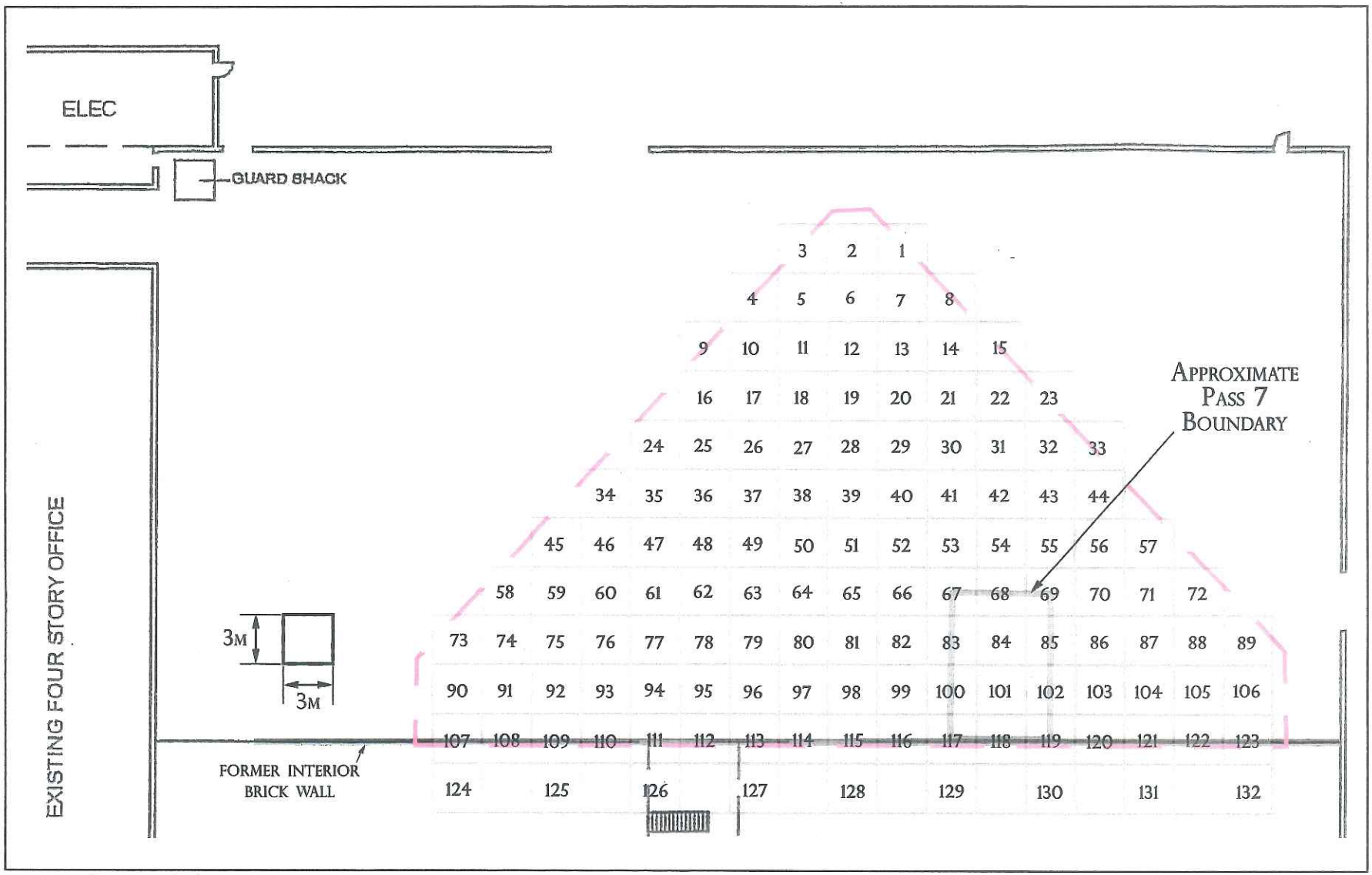
N

1" = 30'

McDowell & Associates

JOB NUMBER: 09-14372

PCB CONCRETE VERIFICATION SAMPLE LOCATION MAP AFTER PASS 7



LEGEND: ☐ = NO TSCA EXCEEDANCE LEVEL AFTER PASS 7

— = RECOMMENDED REMEDIAL AREA ~ 9500 SQFT.

N

1" = 30'

Attachment V –

PCB Analytical Table

Concrete Sample PCB Results Comparison Table Only Showing Samples With Detection's

Floor Swept Prior Sampling		Pass 1 & 2 Completed Prior Sampling		Pass 3 Completed Prior Sampling		Pass 4 and Approx 1" Cut at Grid 98		Pass 5 Completed Prior Sampling		Pass 6 Completed Prior Sampling		Pass 7 Completed Prior Sampling	
Concrete Sample 11/1/2010		Concrete Sample 12/6/2010		Concrete Sample 12/27/2010		Concrete Sample 1/13/2011		Concrete Sample 1/26/2011		Concrete Sample 2/7/2011		Concrete Sample 3/8/2011	
Grid Interval 22' x 24' Samples Obtained in Grids with Elevated Wipe Sample Results		Grid Interval 10' x 10' per EPA Guidance Doc. Samples Obtained at Grid Intersections											
Concrete #	Results (ug/kg)	Concrete #	Results (ug/kg)	Concrete #	Results (ug/kg)	Concrete #	Results (ug/kg)	Concrete #	Results (ug/kg)	Concrete #	Results (ug/kg)	Concrete #	Results (ug/kg)
		V4	420										
		V14	780										
		V15	460										
		V22	540										
		V27	380										
		V29	330										
		V36	710										
		V41	380										
		V42	370										
		V43	390										
17R	ND	V46	800										
		V47	440										
		V48	350										
		V49	950										
		V50	670										
		V51	580										
		V52	1,300	V-52-1	520								
32R	2,800	V53	1,400	V-53-1	390								
		V54	1,000	V-54-1	BDL								
37R	1,100	V55	770										
		V56	480										
		V57	720										
		V58	400										
		V59	680										
		V60	1,200	V-60-1	630								
		V61	670										
		V62	720										
		V63	1,900	V-63-1	520								
		V64	3,200	V-64-1	600								
		V65	1,500	V-65-1	800								
		V66	970										
		V67	1,900	V-67-1	1,100	V-67-2	BDL						
		V68	1,800	V-68-1	600								
		V72	350										
		V73	590										
		V76	810										
		V77	600										
		V78	670										
		V79	950										
		V80	1,400	V-80-1	380								
		V81	4,200	V-81-1	1,400	V-81-2	1,800	V-81-3	BDL				
		V82	3,100	V-82-1	670								
		V83	2,600	V-83-1	780								
		V84	3,100	V-84-1	1,400	V-84-2	2,200	V-84-3 (V-84-3 Dup)	980 (1,800)	V-84-4 (V-84-4 Dup)	660 (1,400)	V-84-5 (V-84-5 Dup)	470 (520)
16R	2,000	V93	1,600	V-93-1	BDL								
		V94	650										
21R	2,200	V95	860										
		V96	1,200	V-96-1	1,100	V-96-2	390						
		V97	4,200	V-97-1	460								
26R	18,000	V98	13,000	V-98-1	74,000	V-98-2 (cut)	ND	V-98-3	BDL				
		V99	170,000	V-99-1	47,000	V-99-2	76,000	V-99-3	BDL				
31R	16,000	V100	16,000	V-100-1	4,800	V-100-2	16,000	V-100-3	2,400	V-100-4	340		
		V101	14,000	V-101-1	3,000	V-101-2	1,800	V-101-3	4,200	V-101-4	12,000	V-101-5	BDL
		V102	4,800	V-102-1	1,500	V-102-2	640						
		V103	3,600	V-103-1	360								
41R	1,800	V105	1,400	V-105-1	1,200	V-105-2	BDL						
46R	340	V106	390										
		V108	390										
		V114	430										
		V115	390										
		V116	590										
		V117	1,900	V-117-1	670								
		V118	570										
		V119	420										
		V122	760										
		V123	340										
		V124	550										
		V125	3,700	V-125-1	BDL								
				V-125.5	750								
		V126	720										
		V128	680										
		V129	830										
		V130	5,100	V-130-1	660								
		V131	2,000	V-131-1	BDL								

Notes:

1. Hi-lighted cells indicate value above TSCA level of 1,000 ug/kg.
2. If grid space left blank, no sample completed in that area.
3. "ND" = Not Detected.
4. "BDL" = Below Detection Limit
5. Hi-lighted colors correlate with accompanying sample location maps.
6. Boldface values which exceed current MDEQ Generic Industrial & Commerical II Direct Contact Criteria.
7. * = V-98 grid was re-sampled after V-98-2 as V-98-3 to confirm deep cut in only that area (1/2") was successful.
8. (Dup) = Duplicate

Attachment VI –

Waste Manifest

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number: M I K 4 2 1 9 5 5 8 6 9	2. Page 1 of 1	3. Emergency Response Phone: 586-469-0041	4. Manifest Tracking Number: 007246850 JJK

5. Generator's Name and Mailing Address
DETROIT MT. ELLIOTT REAL ESTATE, LLC.
6850 MIDDLEBELT
ROMULUS MI 48174

Generator's Site Address (if different than mailing address)
DETROIT MT. ELLIOT REAL ESTATE, LLC.
8600-8650 MT. ELLIOTT STREET
DETROIT MI 48201

Generator's Phone: 734 721 2334

6. Transporter 1 Company Name: HM Environmental Servcies, Inc. — U.S. EPA ID Number: M I R 0 0 0 0 1 7 0 7 9

7. Transporter 2 Company Name — U.S. EPA ID Number:

8. Designated Facility Name and Site Address — U.S. EPA ID Number: M I D 0 4 8 0 9 0 6 3 3
WAYNE DISPOSAL, INC.
49350 NORTH I-94 SERVICE DRIVE
BELLEVILLE MI 48174
Facility's Phone: 800 521-0998

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3432, Polychlorinated biphenyls, solid 9, PGII	19	DM	~~01045~~ 4318	~~G~~ KG	PCB6 3-00
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
PCB IMPACTED CONCRETE WASTE FROM SITE IMPROVEMENT ACTIVITIES. APPROVAL#D117354WDI
12/6/10-55D
Cont #'s 1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: David Collins — Signature: [signature] — Month / Day / Year: [illegible]

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:
Transporter signature (for exports only):

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Kyse L. Kurt — Signature: [signature] — Month 05 Day 18 Year 11
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Okay to correct manifest per Bob Burns. 5/18/11 (DP)
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. PCB 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Josh Hall — Signature: [signature] — Month 5 Day 18 Year 11

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

TRANSPORTER'S COPY

THE ENVIRONMENTAL QUALITY COMPANY ®

Generator Approval Notification May 13, 2011

Customer: HM ENVIRONMENTAL SERVICES, INC.
Fax: (586) 469-1014

ENVIRONMENTAL MANAGER
DETROIT MT. ELLIOTT REAL ESTA
6850 MIDDLEBELT
ROMULUS, MI 48174

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: **Wayne Disposal, Inc. (MID048090633)**
49350 North I-94 Service Drive, Belleville, Michigan 48111

Approval Number: D117354WDI

Generator EPA ID: MIK421958869 **Expires On:** 04/26/2012
Waste Common Name: PCB IMPACTED CONCRETE WASTE FROM SITE IMPROV ACTIV
Comments: Use PCB6 waste code on manifest. Schedule into Wayne. Include storage start date, unique container numbers, and weights in kg. No Free liquids

Primary Waste Code: PCB6
Secondary Waste Codes:

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.

Attachment VII –

U.S. EPA Self-Implementing Cleanup Approval Letter

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUL 12 2010

LU-9J

McDowell & Associates
21355 Hatcher Avenue
Ferndale, Michigan 48220

RE: *PCB Self-Implementing Site Cleanup Plan for*
Detroit Mt. Elliot Real Estate, LLC, Existing Industrial Building –
Former Wood Block Floor Area
8600-8650 Mt. Elliott Street,
Detroit, Wayne County, Michigan

Dear Mr. Douglas McDowell and Ms. Jennifer Lagerbohm,

We have completed our review of the *May 20, 2010,* notification and certification that you intend to conduct a self-implementing cleanup and disposal of PCB remediation waste in accordance with the requirements of 40 CFR 761.61(a). Based on our review, your notification is hereby approved, subject to the following conditions:

1. As stated in 40 CFR 761.61(a), you must conduct the cleanup in accordance with all applicable requirements of 40 CFR 761.61(a)(1) through (9). A copy of those requirements is enclosed for your convenience. To assist you in completing the cleanup successfully, we have placed an "X" in the margin to identify specific requirements for which your notice is deficient in describing how you plan to comply. Specific comments about each of the deficient areas are noted in bold italics following the regulatory citation.

2. You must prepare a cleanup completion summary report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements, including those marked with an "X" on the enclosure. You must send a copy to me no later than January 10, 2011.

3. If your cleanup activity includes the use of a fence or a cap that must be maintained in perpetuity, or if any portion of the site is cleaned up to the levels appropriate for low occupancy areas, then you must notify us thirty days prior to any change in ownership of the property. Such notice must include the name, address and telephone number of the new owner, and the name of the new owner's contact person for this matter. You must also submit a letter, signed by the potential purchaser, stating whether it intends to maintain the fence or cap, and whether it plans to maintain the low occupancy land use, or whether it intends to remove and dispose of additional PCB-contaminated soils off-site instead.

Please note that this approval does not relieve you from your duty to comply with all other applicable federal, state, and local requirements. In addition, please note that if you wish to make any changes to your notification (including changes in the project schedule), then you must submit your proposal to *Juan Thomas*, of my staff, in writing no less than 14 calendar days prior to the proposed implementation of the change. If you have any questions, please contact him by e-mail at thomas.juan@epa.gov or by telephone at (312) 886- 6010.

Sincerely,

Jose G. Cisneros
Chief
Remediation and Reuse Branch

Enclosure

cc:

ENCLOSURE

Regulatory Requirements of 40 CFR 761.61(a)

Please note that an "X" in the margin [ ] indicates that the notification and certification of your intention to conduct a self-implementing cleanup does not adequately explain how you intend to comply with the regulatory requirement.

[ ] (1) ***Applicability***

(i) The self-implementing procedures may not be used to clean up:

(A) Surface or ground waters.

(B) Sediments in marine and freshwater ecosystems.

(C) Sewers or sewage treatment systems.

(D) Any private or public drinking water sources or distribution systems.

(E) Grazing lands.

(F) Vegetable gardens.

[ ] (ii) The self-implementing cleanup provisions shall not be binding upon cleanups conducted under other authorities, including but not limited to, actions conducted under section 104 or section 106 of CERCLA, or section 3004(u) and (v) or section 3008(h) of RCRA.

[X] (2) ***Site characterization***. Any person conducting self-implementing cleanup of PCB remediation waste must characterize the site adequately to be able to provide the information required by paragraph (a)(3) of this section. Subpart N of this part provides a method for collecting new site characterization data or for assessing the sufficiency of existing site characterization data.

The proposed Cleanup Plan submitted by McDowell & Associates, dated May 20, 2010, identifies that wipe samples of concrete were used to characterize the surface to determine whether cleanup is necessary. For older releases to concrete (i.e. > 72 hours), bulk sampling is required. From p. 52 of EPA's January 2009 PCB Q&A Manual:

Q: May I use a wipe test to determine the PCB concentration of concrete for purposes of determining whether a cleanup is complete or necessary?

A: You may use a wipe sample to determine the PCB concentration of concrete that has been contaminated by a spill of PCBs less than 72 hours old (see §761.79(b)(4)). For concrete contaminated by older spills, you must determine the PCB concentration by analyzing a bulk sample of the concrete.

[ ] (3) ***Notification and certification***.

[ ] (i) At least 30 days prior to the date that the cleanup of a site begins, the person in charge of the cleanup or the owner of the property where the PCB remediation waste is located shall notify, in writing, the EPA Regional Administrator, the Director of the State or Tribal environmental protection agency, and the Director of the county or

local environmental protection agency where the cleanup will be conducted. The notice shall include:

[ ] (A) The nature of the contamination, including kinds of materials contaminated.

[ ] (B) A summary of the procedures used to sample contaminated and adjacent areas and a table or cleanup site map showing PCB concentrations measured in all pre-cleanup characterization samples. The summary must include sample collection and analysis dates. The EPA Regional Administrator may require more detailed information including, but not limited to, additional characterization sampling or all sample identification numbers from all previous characterization activities at the cleanup site.

[ ] (C) The location and extent of the identified contaminated area, including topographic maps with sample collection sites cross referenced to the sample identification numbers in the data summary from paragraph (a)(3)(i)(B) of this section.

[X] (D) A cleanup plan for the site, including schedule, disposal technology, and approach. This plan should contain options and contingencies to be used if unanticipated higher concentrations or wider distributions of PCB remediation waste are found or other obstacles force changes in the cleanup approach.

The proposed Cleanup Plan submitted by McDowell & Associates, dated May 20, 2010, does not specify a schedule for implementation of the clean-up effort. A schedule indicating commencement and estimated time frame for completion shall be submitted to U.S. EPA before commencement of any clean-up activity.

[ ] (E) A written certification, signed by the owner of the property where the cleanup site is located and the party conducting the cleanup, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the location designated in the certificate, and are available for EPA inspection. Persons using alternate methods for chemical extraction and chemical analysis for site characterization must include in the certificate a statement that such a method will be used and that a comparison study which meets or exceeds the requirements of subpart Q of this part, and for which records are on file, has been completed prior to verification sampling.

[ ] (ii) Within 30 calendar days of receiving the notification, the EPA Regional Administrator will respond in writing approving of the self-implementing cleanup, disapproving of the self-implementing cleanup, or requiring additional information. If the EPA Regional Administrator does not respond within 30 calendar days of receiving the notice, the person submitting the notification may assume that it is complete and acceptable and proceed with the cleanup according to the information

the person provided to the EPA Regional Administrator. Once cleanup is underway, the person conducting the cleanup must provide any proposed changes from the notification to the EPA Regional Administrator in writing no less than 14 calendar days prior to the proposed implementation of the change. The EPA Regional Administrator will determine in his or her discretion whether to accept the change, and will respond to the change notification verbally within 7 calendar days and in writing within 14 calendar days of receiving it. If the EPA Regional Administrator does not respond verbally within 7 calendar days and in writing within 14 calendar days of receiving the change notice, the person who submitted it may deem it complete and acceptable and proceed with the cleanup according to the information in the change notice provided to the EPA Regional Administrator.

[ ] (iii) Any person conducting a cleanup activity may obtain a waiver of the 30-day notification requirement, if they receive a separate waiver, in writing, from each of the agencies they are required to notify under this section. The person must retain the original written waiver as required in paragraph (a)(9) of this section.

[ ] (4) ***Cleanup levels.*** For purposes of cleaning, decontaminating, or removing PCB remediation waste under this section, there are four general waste categories: bulk PCB remediation waste, non-porous surfaces, porous surfaces, and liquids. Cleanup levels are based on the kind of material and the potential exposure to PCBs left after cleanup is completed.

[ ] (i) *Bulk PCB remediation waste.* Bulk PCB remediation waste includes, but is not limited to, the following non-liquid PCB remediation waste: soil, sediments, dredged materials, muds, PCB sewage sludge, and industrial sludge.

[X] (A) *High occupancy areas.* The cleanup level for bulk PCB remediation waste in high occupancy areas is ≤1 ppm without further conditions. High occupancy areas where bulk PCB remediation waste remains at concentrations >1 ppm and ≤10 ppm shall be covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

The proposed Cleanup Plan submitted by McDowell & Associates, dated May 20, 2010, does not indicate what respective clean-up levels are target goals. It is understood by U.S EPA that since the no mention of a covered cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section, was specified in the plan, cleanup levels applicable to this are as noted above in this section.

[ ] (B) *Low occupancy areas.*

[ ] (1) The cleanup level for bulk PCB remediation waste in low occupancy areas is ≤25 ppm unless otherwise specified in this paragraph.

[ ] (2) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤50 ppm if the site is secured by a fence and marked with a sign including the M_L mark.

[ ] (3) Bulk PCB remediation wastes may remain at a cleanup site at concentrations >25 ppm and ≤100 ppm if the site is covered with a cap meeting the requirements of paragraphs (a)(7) and (a)(8) of this section.

[ ] (ii) *Non-porous surfaces.* In high occupancy areas, the surface PCB cleanup standard is ≤ 10 µg/100 cm^2 of surface area. In low occupancy areas, the surface cleanup standard is <100 µg/100 cm^2 of surface area. Select sampling locations in accordance with subpart P of this part or a sampling plan approved under paragraph (c) of this section.

[X] (iii) *Porous surfaces.* In both high and low occupancy areas, any person disposing of porous surfaces must do so based on the levels in paragraph (a)(4)(i) of this section. Porous surfaces may be cleaned up for use in accordance with §761.79(b)(4) or §761.30(p).

See item 4 (i) (A) above.

[ ] (iv) *Liquids.* In both high and low occupancy areas, cleanup levels are the concentrations specified in §761.79(b)(1) and (b)(2).

[ ] (v) *Change in the land use for a cleanup site.* Where there is an actual or proposed change in use of an area cleaned up to the levels of a low occupancy area, and the exposure of people or animal life in or at that area could reasonably be expected to increase, resulting in a change in status from a low occupancy area to a high occupancy area, the owner of the area shall clean up the area in accordance with the high occupancy area cleanup levels in paragraphs (a)(4)(i) through (a)(4)(iv) of this section.

[ ] (vi) The EPA Regional Administrator, as part of his or her response to a notification submitted in accordance with §761.61(a)(3) of this part, may require cleanup of the site, or portions of it, to more stringent cleanup levels than are otherwise required in this section, based on the proximity to areas such as residential dwellings, hospitals, schools, nursing homes, playgrounds, parks, day care centers, endangered species habitats, estuaries, wetlands, national parks, national wildlife refuges, commercial fisheries, and sport fisheries.

[ ] (5) ***Site cleanup.*** In addition to the options set out in this paragraph, PCB disposal technologies approved under §§761.60 and 761.70 are acceptable for on-site self-implementing PCB remediation waste disposal within the confines of the operating conditions of the respective approvals.

[ ] (i) *Bulk PCB remediation waste.* Any person cleaning up bulk PCB remediation waste shall do so to the levels in paragraph (a)(4)(i) of this section.

[ ] (A) Any person cleaning up bulk PCB remediation waste on-site using a soil washing process may do so without EPA approval, subject to all of the following:

(1) A non-chlorinated solvent is used.

(2) The process occurs at ambient temperature.

(3) The process is not exothermic.

(4) The process uses no external heat.

(5) The process has secondary containment to prevent any solvent from being released to the underlying or surrounding soils or surface waters.

(6) Solvent disposal, recovery, and/or reuse is in accordance with relevant provisions of approvals issued according to paragraphs (b)(1) or (c) of this section or applicable paragraphs of §761.79.

[ ] (B) Bulk PCB remediation waste may be sent off-site for decontamination or disposal in accordance with this paragraph, provided the waste is either dewatered on-site or transported off-site in containers meeting the requirements of the DOT Hazardous Materials Regulations (HMR) at 49 CFR parts 171 through 180.

[ ] (1) Removed water shall be disposed of according to paragraph (b)(1) of this section.

[ ] (2) Any person disposing off-site of dewatered bulk PCB remediation waste shall do so as follows:

(i) Unless sampled and analyzed for disposal according to the procedures set out in §§761.283, 761.286, and 761.292, the bulk PCB remediation waste shall be assumed to contain ≥50 ppm PCBs.

(ii) Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.

(iii) Bulk PCB remediation wastes with a PCB concentration ≥50 ppm shall be disposed of in a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA, or a PCB disposal facility approved under this part.

(iv) The generator must provide written notice, including the quantity to be shipped and highest concentration of PCBs (using extraction EPA Method 3500B/3540C or Method 3500B/3550B followed by chemical analysis using EPA Method 8082 in SW-846 or methods validated under subpart Q of this part) at least 15 days before the first shipment of bulk PCB remediation waste from each cleanup site by the generator, to each off-site facility where the waste is destined for an area not subject to a TSCA PCB Disposal Approval.

[ ] (3) Any person may decontaminate bulk PCB remediation waste in accordance with §761.79 and return the waste to the cleanup site for disposal as long as the cleanup standards of paragraph (a)(4) of this section are met.

[ ] (ii) Non-porous surfaces. PCB remediation waste non-porous surfaces shall be cleaned on-site or off-site for disposal on-site, disposal off-site, or use, as follows:

[ ] (A) For on-site disposal, non-porous surfaces shall be cleaned on-site or off-site to the levels in paragraph (a)(4)(ii) of this section using:
(1) Procedures approved under §761.79.
(2) Technologies approved under §761.60(e).
(3) Procedures or technologies approved under paragraph (c) of this section.

[ ] (B) For off-site disposal, non-porous surfaces:
(1) Having surface concentrations <100 $\mu g/100\ cm^2$ shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(ii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(i).
(2) Having surface concentrations ≥100 $\mu g/100\ cm^2$ shall be disposed of in accordance with paragraph (a)(5)(i)(B)(2)(iii) of this section. Metal surfaces may be thermally decontaminated in accordance with §761.79(c)(6)(ii).

[ ] (C) For use, non-porous surfaces shall be decontaminated on-site or off-site to the standards specified in §761.79(b)(3) or in accordance with §761.79(c).

[ ] (iii) *Porous surfaces.* Porous surfaces shall be disposed on-site or off-site as bulk PCB remediation waste according to paragraph (a)(5)(i) of this section or decontaminated for use according to §761.79(b)(4), as applicable.

[ ] (iv) *Liquids.* Any person disposing of liquid PCB remediation waste shall either:
(A) Decontaminate the waste to the levels specified in §761.79(b)(1) or (b)(2).
(B) Dispose of the waste in accordance with paragraph (b) of this section or an approval issued under paragraph (c) of this section.

[ ] (v) *Cleanup wastes.* Any person generating the following wastes during and from the cleanup of PCB remediation waste shall dispose of or reuse them using one of the following methods:

[ ] (A) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from cleanup activities shall be either decontaminated in accordance with §761.79(b) or (c), or disposed of in one of the following facilities, without regard to the requirements of subparts J and K of this part:
(1) A facility permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter.

(2) A facility permitted, licensed, or registered by a State to manage non-municipal non-hazardous waste subject to §§257.5 through 257.30 of this chapter, as applicable.
(3) A hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
(4) A PCB disposal facility approved under this part.

[ ] (B) Cleaning solvents, abrasives, and equipment may be reused after decontamination in accordance with §761.79.

[ ] (6) ***Cleanup verification*** —

[ ] (i) *Sampling and analysis.* Any person collecting and analyzing samples to verify the cleanup and on-site disposal of bulk PCB remediation wastes and porous surfaces must do so in accordance with subpart O of this part. Any person collecting and analyzing samples from non-porous surfaces must do so in accordance with subpart P of this part. Any person collecting and analyzing samples from liquids must do so in accordance with §761.269. Any person conducting interim sampling during PCB remediation waste cleanup to determine when to sample to verify that cleanup is complete, may use PCB field screening tests.

[ ] (ii) *Verification.*
(A) Where sample analysis results in a measurement of PCBs less than or equal to the levels specified in paragraph (a)(4) of this section, self-implementing cleanup is complete.
(B) Where sample analysis results in a measurement of PCBs greater than the levels specified in paragraph (a)(4) of this section, self-implementing cleanup of the sampled PCB remediation waste is not complete. The owner or operator of the site must either dispose of the sampled PCB remediation waste, or reclean the waste represented by the sample and reinitiate sampling and analysis in accordance with paragraph (a)(6)(i) of this section.

[ ] (7) ***Cap requirements.*** A cap means, when referring to on-site cleanup and disposal of PCB remediation waste, a uniform placement of concrete, asphalt, or similar material of minimum thickness spread over the area where remediation waste was removed or left in place in order to prevent or minimize human exposure, infiltration of water, and erosion. Any person designing and constructing a cap must do so in accordance with §264.310(a) of this chapter, and ensure that it complies with the permeability, sieve, liquid limit, and plasticity index parameters in §761.75(b)(1)(ii) through (b)(1)(v). A cap of compacted soil shall have a minimum thickness of 25 cm (10 inches). A concrete or asphalt cap shall have a minimum thickness of 15 cm (6 inches). A cap must be of sufficient strength to maintain its effectiveness and integrity during the use of the cap surface which is exposed to the environment. A cap shall not be contaminated at a level ≥1 ppm PCB per AroclorTM(or equivalent) or per congener. Repairs shall begin within 72 hours of discovery for any breaches which would impair the integrity of the cap.

[ ] (8) ***Deed restrictions for caps, fences and low occupancy areas.*** When a cleanup activity conducted under this section includes the use of a fence or a cap, the owner of the site must maintain the fence or cap, in perpetuity. In addition, whenever a cap, or the procedures and requirements for a low occupancy area, is used, the owner of the site must meet the following conditions:

[ ] (i) Within 60 days of completion of a cleanup activity under this section, the owner of the property shall:

[ ] (A) Record, in accordance with State law, a notation on the deed to the property, or on some other instrument which is normally examined during a title search, that will in perpetuity notify any potential purchaser of the property:
(1) That the land has been used for PCB remediation waste disposal and is restricted to use as a low occupancy area as defined in §761.3.
(2) Of the existence of the fence or cap and the requirement to maintain the fence or cap.
(3) The applicable cleanup levels left at the site, inside the fence, and/or under the cap.

[ ] (B) Submit a certification, signed by the owner, that he/she has recorded the notation specified in paragraph (a)(8)(i)(A) of this section to the EPA Regional Administrator.

[ ] (ii) The owner of a site being cleaned up under this section may remove a fence or cap after conducting additional cleanup activities and achieving cleanup levels, specified in paragraph (a)(4) of this section, which do not require a cap or fence. The owner may remove the notice on the deed no earlier than 30 days after achieving the cleanup levels specified in this section which do not require a fence or cap.

[ ] (9) ***Recordkeeping***. For paragraphs (a)(3), (a)(4), and (a)(5) of this section, recordkeeping is required in accordance with §761.125(c)(5).

Attachment VIII –

McDowell & Associates Self-Implementing Cleanup Approval Letter

CLEANUP PLAN FOR SELF-IMPLEMENTING SITE CLEANUP AND DISPOSAL OF PCB REMEDIATION WASTE DETROIT MT. ELLIOTT REAL ESTATE, LLC EXISTING INDUSTRIAL BUILDING – FORMER WOOD BLOCK FLOOR AREA 8600-8650 MT. ELLIOTT STREET DETROIT, WAYNE COUNTY, MICHIGAN

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604
MAIL CODE LU-9J

BY
McDOWELL & ASSOCIATES
21355 HATCHER AVENUE
FERNDALE, MICHIGAN 48220
Ph: (248) 399-2066
Fax: (248) 399-2157
www.mcdowasc.com

MAY 20, 2010

McDowell & Associates
Geotechnical, Environmental & Hydrogeological Services • Materials Testing & Inspection
21355 Hatcher Avenue • Ferndale, MI 48220
Phone: (248) 399-2066 • Fax: (248) 399-2157
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www.mcdowasc.com

May 20, 2010

U.S. Environmental Protection Agency (EPA)
77 W. Jackson Boulevard
Chicago, Illinois 60604
Mail Code LU-9J

Job No. 09-14372

Attention: Mr. Peter Ramanauskas

Subject: Cleanup Plan for Self-Implementing Site Cleanup and Disposal of PCB Remediation Waste
Detroit Mt. Elliott Real Estate, LLC
Existing Industrial Building - Former Wood Block Floor Area
8600-8650 Mt. Elliott Street
Detroit, Wayne County, Michigan

Dear Mr. Ramanauskas,

Pursuant to the request of Detroit Mt. Elliott Real Estate, McDowell & Associates has completed this Cleanup Plan for Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste (Cleanup Plan) for the subject property.

This Cleanup Plan is being submitted to the US EPA as notification of the planned activities, in accordance with 40 CFR 761.61(a)(3). Copies of the Cleanup Plan are also being submitted to the Michigan Department of Natural Resources and Environment (MDNRE) and the Wayne County Environmental Health Department.

Background

The subject property consists of an approximate 313,000 square foot industrial building located at 8600-8650 Mt. Elliott Street in Detroit, Wayne County, Michigan. A Site Location Map, which shows the approximate location of the subject property, accompanies this letter as Attachment I. A legal description for the subject property accompanies this letter as Attachment II. Detroit Mt. Elliott Real Estate, LLC recently purchased the property from Monarch Steel Company.

The building on the subject property was originally constructed in 1925 with additions in 1930, 1933, and 1937. The building was reportedly originally used for automotive manufacturing and steel milling.

The former wood block floor was located in the original portion of the building constructed in 1925 and comprises about 27,000 square feet. A Site Map, which shows the approximate location of the former wood block floor in relation to the entire building, accompanies this letter as Attachment III.

Based on information provided to McDowell & Associates by Monarch Steel Company (former owner), polychlorinated biphenyls (PCBs) were reportedly detected in a wood chip sample obtained in 1987 from the former wood block floor at a concentration of 63 ppm. Great Lakes Environmental reportedly removed the wood block floor in May 1987 for off-site disposal. The concrete floor beneath the wood block was reportedly cleaned. Wipe samples reportedly obtained following floor cleaning did not show detectable concentrations of PCBs.

McDowell & Associates completed a Phase I ESA for the subject property on March 16, 2010. Remnants of the wood block floor were observed during McDowell & Associates site visits in 2009 and 2010.

McDowell & Associates completed a Phase II ESA for the subject property on March 16, 2010. As part of that investigation, McDowell & Associates obtained four wipe samples (W-1 through W-4) on May 29, 2009 from the former wood block floor area to investigate for residual PCB contamination from the former use. Results of wipe samples showed PCBs were detected in each of the samples. The detected concentrations in W-3 and W-4 exceed the TSCA Regulatory Action Level of 10 ug/100cm^2.

In March 2010, McDowell & Associates obtained 34 additional wipe samples from the area of the former wood block floor to estimate the extent of concrete with elevated PCBs. Results of testing showed PCBs were detected in 10 of the 34 samples at concentrations above 10 ug/100cm^2.

Summary of Sampling and Extent of Contamination

On May 29, 2009, McDowell & Associates obtained four wipe samples, designated W-1 though W-4, from the area of the former wood block floor.

On March 2, 2010, McDowell & Associates developed a grid system for the area of the former wood block floor into 50 grid units, based on the MDEQ Sampling Strategies and Statistics Training Materials (S^{3}TM) for statistical sampling of medium sites (10,890 to 130,680 square feet). (Wipe samples were randomly obtained from 15 of the grid units - 30% of the grids following guidance in S^{3}TM.)

On March 18, 2010, McDowell & Associates obtained 19 additional wipe samples to delineate the area with elevated PCBs.

A PCB Wipe Sample Location Map, which shows the grid overlaid on the area of the former wood block floor along with sample locations, PCB concentrations, and the proposed remedial area, accompanies this letter as Attachment IV.

Wipe samples were obtained from 100 cm^2 areas, preserved with laboratory-provided hexane, and stored in pre-cleaned, labeled, glass jars. Samples were submitted to Brighton Analytical, LLC of Brighton, Michigan for chemical testing to determine the presence of polychlorinated biphenyls (PCBs, Method 8082).

The following table summarizes results of chemical testing.

Sample	Date	PCB Concentration (ug/100cm2)
W-1	5/29/09	4.7
W-2	5/29/09	5.3
W-3	**5/29/09**	**10.6**
W-4	**5/29/09**	**16.4**
5	3/2/10	3.8
6	3/2/10	5.1
11	**3/2/10**	**13**
12	3/18/10	4.6
12W	3/18/10	5.8
16	**3/18/10**	**17**
17	**3/2/10**	**13**
18	3/18/10	8.1
21	**3/18/10**	**48**
21W	**3/18/10**	**38**
22	3/18/10	9.3
22W	3/18/10	7.7
23	**3/2/10**	**14**
23W	3/18/10	8.9
24	3/18/10	5.0

Sample	Date	PCB Concentration (ug/100cm2)
24W	3/18/10	2.9
26	**3/18/10**	**790**
27	3/2/10	5.3
29	3/18/10	10
30	3/2/10	5.8
32	**3/18/10**	**16**
32W	**3/18/10**	**11**
34	3/2/10	3.2
35	3/2/10	2.5
37	3/2/10	10
38	3/18/10	5.2
38W	3/18/10	8.9
39	3/2/10	3.9
41	**3/2/10**	**12**
42	3/2/10	5.1
43	3/2/10	2.9
46	3/18/10	6.0
46W	3/18/10	2.8
50	3/2/10	2.2

Results are shown on the grid on the accompanying PCB Wipe Sample Location Map.

Individual test results accompany this letter.

Cleanup Plan

The Cleanup Plan proposed for the area of the former wood block floor was prepared in accordance with 40 CFR 761.79- Decontamination Standards and Procedures. The concrete floor is planned for decontamination by abrasion. The top approximate 1/16" of concrete is planned for removal, except on the south central portion of the remedial area (vicinity Sample 26) where the depth would be extended to 1/4". Debris will be collected using a high-efficiency particulate air (HEPA) equipped vacuum and stored in a container for waste characterization testing.

Verification of Cleanup

Following removal of the impacted concrete, verification sampling of the area will be conducted in accordance with Subpart O.

Samples will be taken of concrete in general accordance with the EPA Standard Operating Procedure for Sampling concrete in the Field (Appendix A of PCB Site Revitalization Guidance Under the Toxic Substance Control Act [November 2005]).

Based on Subpart O and the estimated remedial area, it is expected that between 350 and 500 grid points will be sampled, and sets of nine will be composited in accordance with Subpart O.

Disposal

If the debris created during abrasion contains PCBs at concentrations less than 50 ppm, the debris will be manifested and disposed at a Type II Landfill. If the debris contains PCBs at concentrations of 50 ppm or greater, the debris will be manifested and disposed at a licensed hazardous waste disposal facility.

Report

Upon completion of remedial activities, a written summary report would be completed in accordance with 40 CFR 761.61 that documents cleanup activities, confirmatory sample test results, and disposal of abrasion debris.

Contingency Plan

If unusual conditions are encountered during cleanup that prohibit remediation of the concrete to demonstrate cleanup to levels below 1 ppm, then the cleanup plan may be altered to include one or more of the following alternatives: (1) concrete removal and off-site disposal, (2) concrete capping, (3) restricting access.

If you have any questions regarding the information contained in this report, or if we can be of further service, please do not hesitate to call.

Very truly yours,

McDOWELL & ASSOCIATES

Jennifer Lagerbohm, M.S., CHMM
Industrial Hygienist

Douglas McDowell, M.S., P.E.
Environmental Manager

JL/jl/def/jb

Certification

In accordance with 40 CFR 761.61(a)(3)(E), Detroit Mt. Elliott Real Estate, LLC (current owner of the property and the party conducting the cleanup) and McDowell & Associates (environmental consultant for Detroit Mt. Elliott Real Estate, LLC) certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file at McDowell & Associates' Ferndale office, and are available for U.S. EPA inspection.

Detroit Mt. Elliott Real Estate, LLC

Curt Felch

McDowell & Associates

Douglas M. McDowell, M.S., P.E.

cc: Michigan Department of Natural Resources and Environment
Wayne County Environmental Health Department

Attachments

Attachment I - Site Location Map
Attachment II - Legal Description
Attachment III - Site Map
Attachment IV - PCB Wipe Sample Location Map
Attachment V - Chemical Test Results

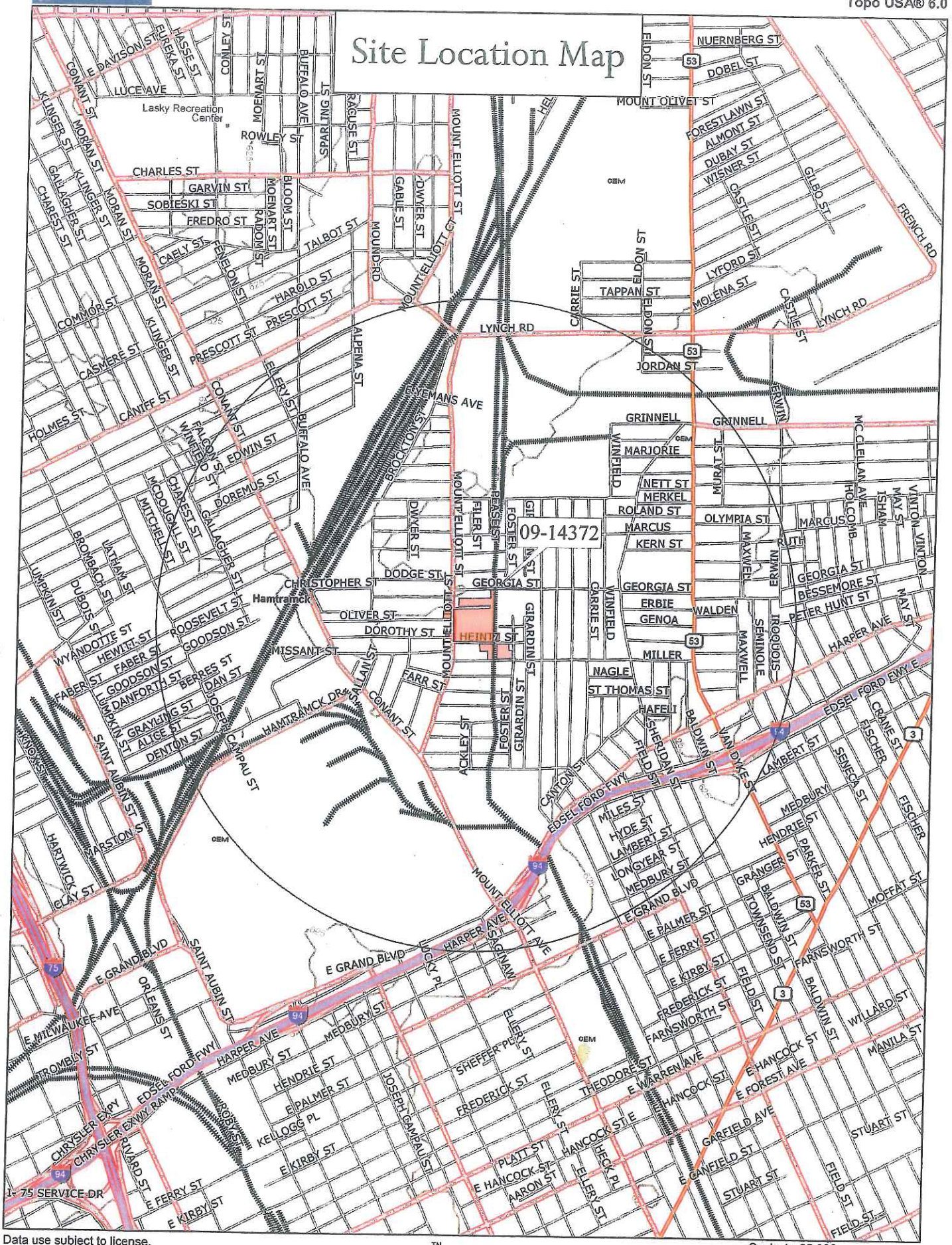
Attachment I

Site Location Map

DeLORME

Topo USA® 6.0

Site Location Map



Data use subject to license.

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www.delorme.com

TN

MN (7.3°W)

Scale 1 : 25,000

0 600 1200 1800 2400 3000 ft

0 200 400 600 800 1000 m

1" = 2,083.3 ft

Data Zoom 13-0

Attachment II

Legal Description

Land situated in the City of Detroit, County of Wayne, State of Michigan, described as follows:

Parcel 1

Lots 1 to 19, both inclusive of HOWE'S SUBDIVISION of part of the East 1/2 of the Southwest 1/4 of Section 21, Town 1 South, Range 12 East, being the South part of Outlot 6 of the J. Dunn Farm, Detroit, Michigan, as recorded in Liber 13 of Plats, page 24, Wayne County Records, together with the vacated alleys lying in the rear of said lots, and all that part of Newhall Street lying Easterly of Mt. Elliott Avenue, beginning at a point, said point being 7.45 feet Northerly along the Easterly line of Mt. Elliott Avenue extended from the Northwest corner of Lot 4 of HOWE'S SUBDIVISION, thence South 0 degrees 13 minutes West 7.45 feet to the Northwest corner of Lot 4 heretofore mentioned; thence North 89 degrees 43 minutes East 279.79 feet to a point; thence in a Westerly direction 279.75 feet to the point of Point of Beginning, also that part of Section 21, Town 1 South, Range 12 East, described as follows: Beginning at the intersection of the Easterly line of Mt. Elliott Avenue and Southerly line of Section 21; thence along the Easterly line of Mt. Elliott Avenue, North degrees 52 minutes East 328.54 feet to the Southerly line of HOWE'S SUBDIVISION; thence along the Southerly line of HOWE'S SUBDIVISION, North 89 degrees 13 minutes East 598.20 feet to the Westerly line of the Michgian Central Railroad Right-of-Way; thence along said Westerly Right-of-Way line South 0 degrees 1 minutes West 344.50 feet to the Northerly line of CHARLES HEINTZ SUBDIVISION; thence along said Northerly line of CHARLES HEINTZ SUBDIVISION, North 89 degrees 16 minutes West 603.22 feet to the Point of Beginning.
ALSO
Lot 8 and Lots 43 to 58, both inclusive, CHARLES HEINTZ SUBDIVISION of part of the Southeast 1/4 of the Southwest 1/4 of Section 21, Town 1 South, Range 12 East, Hamtramck Township, Wayne County, Michigan, as recorded in Liber 29 of Plats, page 6, Wayne County Records, also All of that property lying East and in the rear of Lot 8 and West of Lot 43 of the above described CHARLES HEINTZ SUBDIVISION, said premises being 18 feet by 30 feet. All of said above described premises being bound on the West by Mt. Elliottt Avenue on the South by Heintz Avenue, on the East by the Michigan Central Railroad Right-of-Way and on the North by Newhall Street as constituted after vacation of a portion of Newhall Street by proceedings of the Common Council of the City of Detroit, held April 9, 1935, also all that part of Newhall Street East of Mt. Elliott Avenue lying North of and adjoining the North line of Lot 19 and South of and adjoining the South line of Lot 22 of the aforesaid HOWE'S SUBDIVISION vacated by resolution of the Common Council of the City of Detroit which resolution is recorded in Volume 14306, page 590, Wayne County Records.

Commonly Known As: 8600 Mt. Elliott
Parcel No. Ward 15, Item 014189

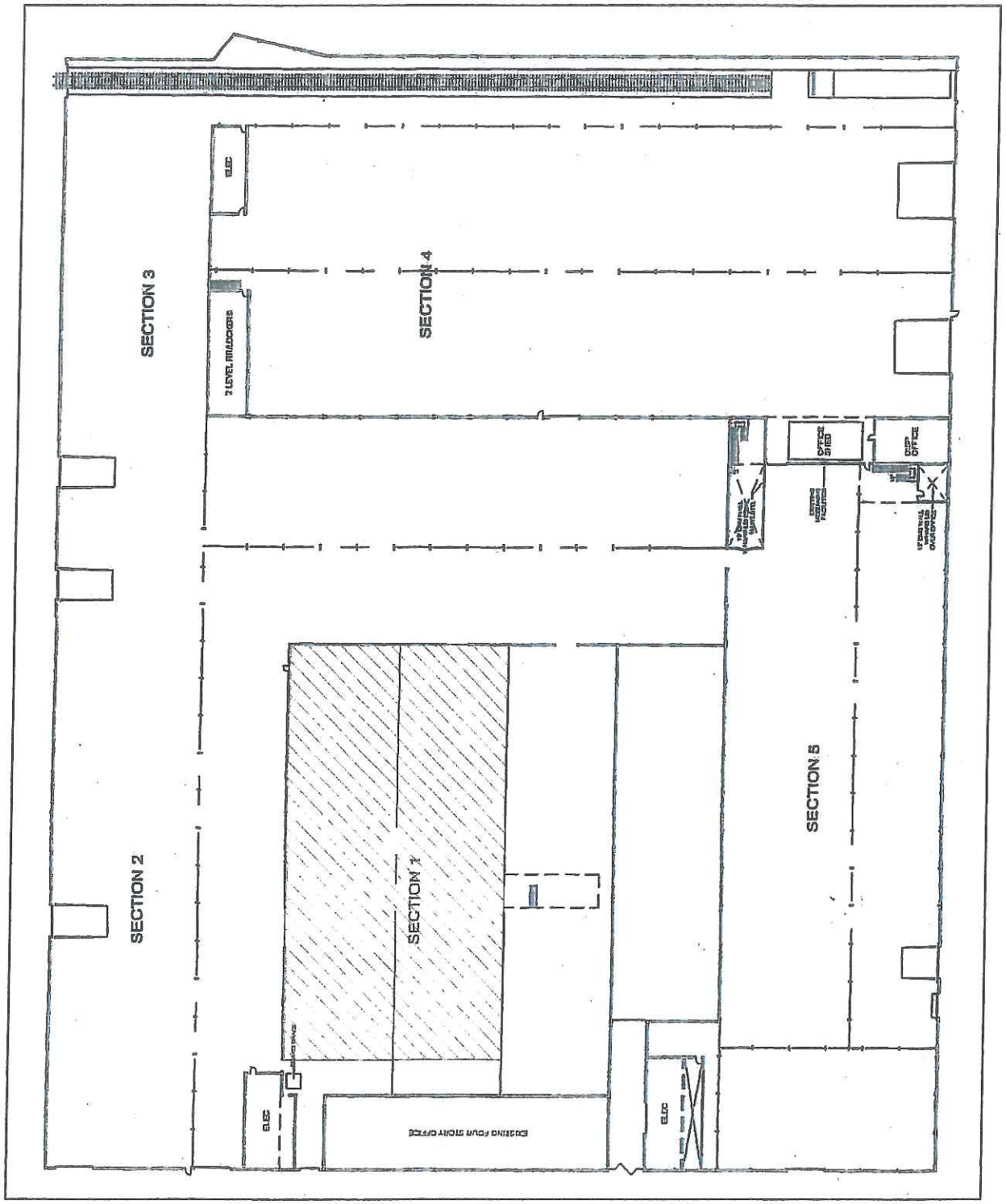
Attachment III

Site Map

McDowell & Associates

JOB NUMBER: 09-14372

FORMER WOOD BLOCK FLOOR



AREA OF FORMER WOOD BLOCK FLOOR

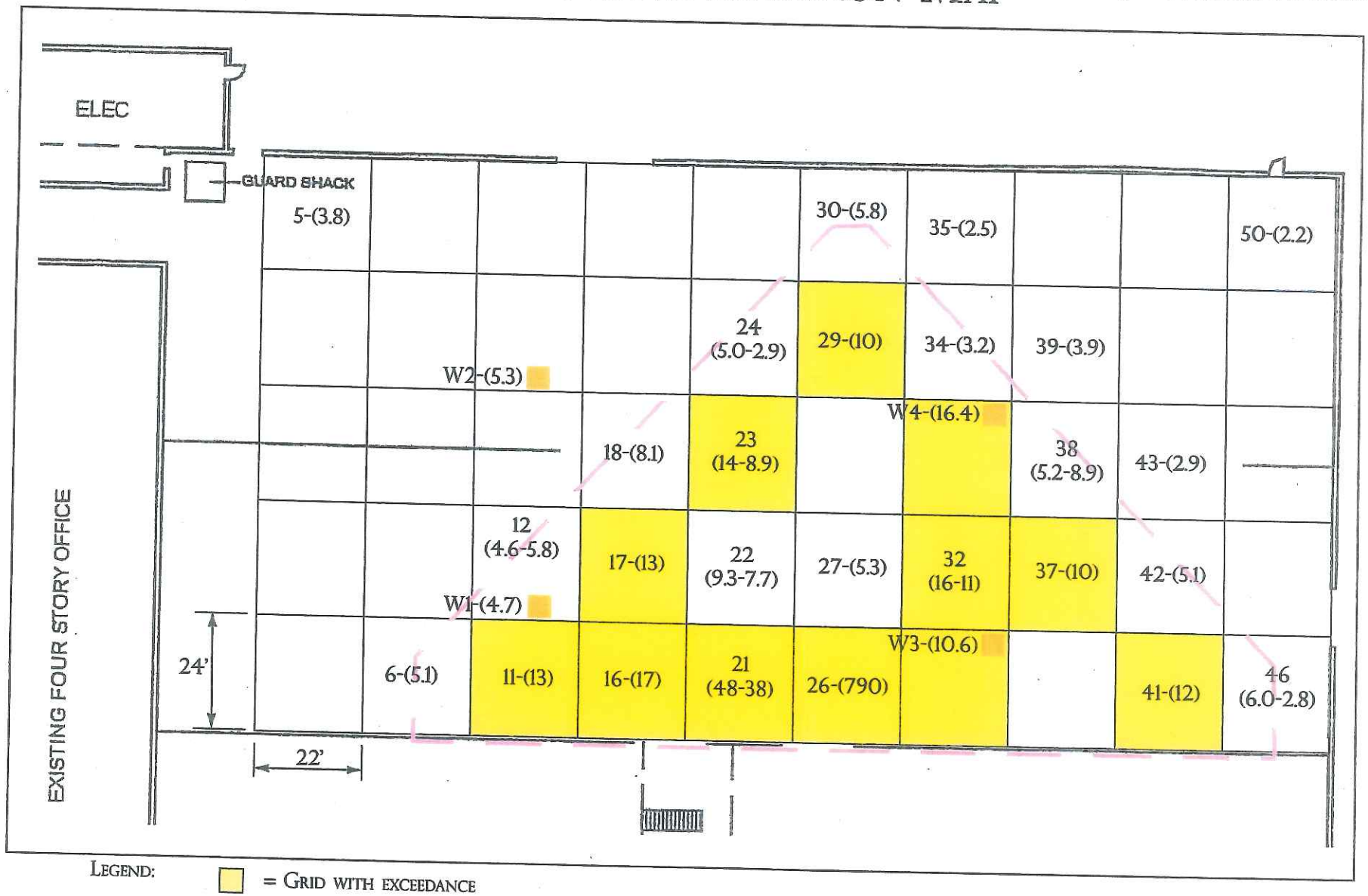
Attachment IV

PCB Wipe Sample Location Map

PCB Wipe Sample Location Map

McDowell Associates

Job Number: 09-14372



Legend:

= Grid with exceedance

= (Samples from 5/29/09, other samples from March 2010)

= Recommended remedial area ~ 9500 sqft.

(__) = Test results (ug/100cm³)

Values shown (__-__) are pre and post washed.

N

1" = 30'

Attachment V

Chemical Test Results

Brighton Analytical L.L.C.™
Brighton Analytical, L.L.C.
2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

Sample Date: 05/29/2009
Submit Date: 05/29/2009
Report Date: 06/02/2009

BA Report Number: **3562**
BA Sample ID: **BR07946**

Project Name: **09-14372**
Project Number: **09-14372**
Sample ID: **W1**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1242	**3.5**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
O 1260	**1.2**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
O 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
otal PCB	**4.7**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
CB wipes (extraction)	**Extracted**			3510/3550	MB	05/29/2009

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDEQ designated target detection limits (TDL).

Released by: _____

Date: 6/2/09

Brighton Analytical L.L.C.™
Brighton Analytical, L.L.C.
2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

Sample Date: 05/29/2009
Submit Date: 05/29/2009
Report Date: 06/02/2009

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **3562**
BA Sample ID: **BR07947**

Project Name: **09-14372**
Project Number: **09-14372**
Sample ID: **W2**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1242	**3.6**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
RO 1260	**1.7**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
tal PCB	**5.3**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
CB wipes (extraction)	**Extracted**			3510/3550	MB	05/29/2009

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDEQ designated target detection limits (TDL).

Released by: [signature]
Date: 6/2/09

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e-mail: bai-brighton@sbcglobal.net

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

mple Date: 5/29/2009
Submit Date: 5/29/2009
Report Date: 6/2/2009

A Report Number: **3562**
BA Sample ID: **BR07948**

Project Name: **09-14372**
Project Number: **09-14372**
Sample ID: **W3**

rameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
B Analysis						
1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1242	**6.1**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1260	**4.5**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
PCB	**10.6**	ug/Wipe	1.0	SW846 8082	BY	6/1/2009
Wipes (extraction)	**Extracted**			3510/3550	MB	5/29/2009

Reported detection limit for analytical method requested. Some
ounds require special analytical methods to achieve MDEQ designated
detection limits (TDL).

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Date: 6/2/09

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To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

ple Date: 05/29/2009
mit Date: 05/29/2009
port Date: 06/02/2009

Report Number: **3562**
BA Sample ID: **BR07949**

Project Name: **09-14372**
Project Number: **09-14372**
Sample ID: **W4**

ameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
Analysis						
016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
242	**15**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
260	**1.4**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
PCB	**16.4**	ug/Wipe	1.0	SW846 8082	BY	06/01/2009
ypes (extraction)	**Extracted**			3510/3550	MB	05/29/2009

eported detection limit for analytical method requested. Some
ounds require special analytical methods to achieve MDEQ designated
tection limits (TDL).

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Date: 6/2/09

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03602**

Project Name: **09-14372**
Project Number:
Sample ID: **12**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**3.9**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**Below det lim**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**4.6**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

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Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03603**

Project Name: **09-14372**
Project Number:
Sample ID: **12W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**4.5**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**1.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**5.8**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

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Date: 3/25/10

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Report Date: 3/25/2010

To: McDowell & Associates
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BA Report Number: **7586**
BA Sample ID: **BT03604**

Project Name: **09-14372**
Project Number:
Sample ID: **16**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**10**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**6.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**17**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

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Date: 3/25/10

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Report Date: 3/25/2010

To: McDowell & Associates
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BA Report Number: **7586**
BA Sample ID: **BT03605**

Project Name: **09-14372**
Project Number:
Sample ID: **18**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**5.9**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**2.2**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**8.1**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

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Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03606**

Project Name: **09-14372**
Project Number:
Sample ID: **21**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1242	**14**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1260	**34**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
Total PCB	**48**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

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Date: 3/25/10

Elevated PCB dl due to sample matrix.

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03607**

Project Name: **09-14372**
Project Number:
Sample ID: **21W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1242	**6.9**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1260	**31**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
Total PCB	**38**	ug/Wipe	3.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: W Wood
Date: 3/25/10

Elevated PCB dl due to sample matrix.

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03608**

Project Name: **09-14372**
Project Number:
Sample ID: **22**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**4.2**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**5.1**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**9.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

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Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
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Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03609**

Project Name: **09-14372**
Project Number:
Sample ID: **22W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**4.4**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**3.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**7.7**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

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Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
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Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03610**

Project Name: **09-14372**
Project Number:
Sample ID: **23W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**6.6**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**2.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**8.9**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: W Wood
Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
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BA Report Number: **7586**
BA Sample ID: **BT03611**

Project Name: **09-14372**
Project Number:
Sample ID: **24**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**3.7**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**1.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**5.0**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: Matthew Topol
Date: 3/25/10

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Report Date: 3/25/2010

To: McDowell & Associates
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BA Report Number: **7586**
BA Sample ID: **BT03612**

Project Name: **09-14372**
Project Number:
Sample ID: **24W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**2.1**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**Below det lim**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**2.9**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: W Topol
Date: 3/25/10

Brighton Analytical L.L.C.™
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2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03613**

Project Name: **09-14372**
Project Number:
Sample ID: **26**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1242	**Below det lim**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1260	**790**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	50	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	50	SW846 8082	BY	3/24/2010
Total PCB	**790**	ug/Wipe	50	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: W Haggol
Date: 3/25/10

Elevated PCB dl due to sample matrix.

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03614**

Project Name: **09-14372**
Project Number:
Sample ID: **29**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**8.8**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**1.6**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**10**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: _____

Date: 3/25/10

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e-mail: bai-brighton@sbcglobal.net

Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03615**

Project Name: **09-14372**
Project Number:
Sample ID: **32**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**4.0**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**12**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**16**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: [signature]
Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03616**

Project Name: **09-14372**
Project Number:
Sample ID: **32W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**3.5**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**7.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**11**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: W Stroud
Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03617**

Project Name: **09-14372**
Project Number:
Sample ID: **38**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**4.1**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**1.1**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**5.2**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: [signature]
Date: 3/25/10

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e-mail: bai-brighton@sbcglobal.net

Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03618**

Project Name: **09-14372**
Project Number:
Sample ID: **38W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**7.7**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**1.2**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**8.9**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: _____

Date: 3/25/10

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Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03619**

Project Name: **09-14372**
Project Number:
Sample ID: **46**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**3.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**2.6**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**6.0**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: W Koppel
Date: 3/25/10

Brighton Analytical L.L.C.™
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2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

Sample Date: 3/18/2010
Submit Date: 3/18/2010
Report Date: 3/25/2010

To: McDowell & Associates
21355 Hatcher Ave.
Ferndale, MI 48220

BA Report Number: **7586**
BA Sample ID: **BT03620**

Project Name: **09-14372**
Project Number:
Sample ID: **46W**

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
PCB Analysis						
ARO 1016	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1221	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1232	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1242	**1.5**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1248	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1254	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1260	**1.3**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1262	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
ARO 1268	**Not detected**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
Total PCB	**2.8**	ug/Wipe	1.0	SW846 8082	BY	3/24/2010
PCB wipes (extraction)	**Extracted**			3510/3550	MB	3/24/2010

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDNR designated target detection limits (TDL).

Released by: Uptegrove
Date: 3/25/10

ADDENDUM NO. 1
PCB SELF-IMPLEMENTING SITE CLEANUP PLAN FOR
DETROIT MT. ELLIOTT REAL ESTATE, LLC
EXISTING INDUSTRIAL BUILDING
FORMER WOOD BLOCK FLOOR AREA
8600-8650 MT. ELLIOTT STREET
DETROIT, WAYNE COUNTY, MICHIGAN

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604
MAIL CODE LU-9J

BY
McDOWELL & ASSOCIATES
21355 HATCHER AVENUE
FERNDALE, MICHIGAN 48220
Ph: (248) 399-2066
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www.mcdowasc.com

NOVEMBER 17, 2010

McDowell & Associates
Geotechnical, Environmental & Hydrogeological Services • Materials Testing & Inspection
21355 Hatcher Avenue • Ferndale, MI 48220
Phone: (248) 399-2066 • Fax: (248) 399-2157
www.mcdowasc.com

November 17, 2010

U.S. Environmental Protection Agency (EPA)
77 W. Jackson Boulevard
Chicago, Illinois 60604
Mail Code LU-9J

Job No. 09-14372

Attention: Mr. Peter Ramanauskas

Subject: Addendum No. 1
PCB Self-Implementing Site Cleanup Plan for
Detroit Mt. Elliott Real Estate, LLC
Existing Industrial Building
Former Wood Block Floor Area
8600-8650 Mt. Elliott Street
Detroit, Wayne County, Michigan

Dear Mr. Ramanauskas:

McDowell & Associates (McDowell) submitted a Cleanup Plan for Self-Implementing Site Cleanup and Disposal of PCB Remediation Waste, dated May 20, 2010, to the U.S. EPA. A response was received, dated July 12, 2010, indicating the notification is approved, subject to three conditions. The purpose of this addendum is to address those conditions as outlined in the U.S. EPA response letter.

1. "As stated in 40 CFR 761.61(a), you must conduct the cleanup in accordance with all applicable requirements of 40 CFR 761.61(a)(1) through (9)."

To initially determine the levels of PCBs and extent of contamination located in the area of the former wood block floor, McDowell obtained a total of 38 wipe samples and submitted for PCB analysis, Method 8082. A "triangular" shaped area of concrete floor was determined to be impacted with elevated levels of PCBs following the wipe sampling. This map was provided in our original submittal to the EPA dated May 20, 2010, and is attached as Map 1.

In order to confirm our initial "triangular" area of impact, on November 1, 2010, McDowell obtained a total of 15 concrete samples following the U.S. EPA "Draft Standard Operating Procedure for Sampling Concrete in the Field", dated 12/20/97. Samples were obtained in all grid areas determined by the wipe sampling to have elevated levels of PCBs, and in select grid areas around the delineated area to confirm the projected extent of cleanup. Samples were submitted for chemical analysis of PCBs, Method 8082. Additionally, McDowell contacted Mr. Juan Thomas of the U.S. EPA Remediation and Reuse Branch to confirm proper protocol for the follow-up confirmatory concrete sampling. According to Mr. Thomas, a minimum of three samples of concrete was required for chemical analysis. A map showing the elevated areas of PCBs, above TSCA and Michigan Department of Natural Resources and Environment (MDNRE) Part 201 levels, found in the concrete samples is attached as Map 2.

McDowell conducted a linear regression statistical analysis on the two sample test results for samples obtained at similar location, plotting PCB wipe test results (x-axis) against PCB bulk test results (y-axis). As shown on the on the accompanying graph, higher PCB wipe test results consistently show correlation with bulk sample test results, with a correlation coefficient (R^2) of 0.9683. Typically, R^2 values greater than 0.95 indicate correlation between two data sets at a 95% confidence level.

Based on that information, it is our professional opinion that wipe test result data obtained by McDowell for the subject property can be relied upon to provide a conservative estimate of the extent of concrete surface area contaminated with elevated PCBs. The Correlation Analysis graph is attached to this report. Map 3 – "PCB Wipe Sample and Concrete Sample Correlation Map" is also attached showing the overlapping data results and estimated "triangular" area of cleanup.

Mt. Elliott Real Estate, LLC intends to proceed with the clean-up, following the U.S. EPA 761.61 "PCB remediation waste", directing McDowell to complete a report to the EPA no later than January 10, 2011. Specifically, as concrete is a porous surface, McDowell intends to follow 761.61(a)(iii). McDowell interprets this guideline for cleanup as the following:

- The concrete is a considered to be a porous surface that was impacted over a time period of greater than 72 hours. Therefore, we interpret Rule 761.30(p)(2) to apply.
- The concrete surface is intended to be removed using mechanical means to the depth required to meet criteria for a "low occupancy space." Material generated during the remedial process will be disposed at a licensed landfill in accordance with 761.62. The concrete is planned to be disposed at a licensed solid waste landfill, if the analytical testing leaches PCBs at <10 ug/L (following 761.62(b)(ii)). McDowell also will obtain proper landfill approval for disposal. Should the analytical testing leach at a greater level, than the waste will be disposed following 761.62(a).
- Cleanup verification sampling of the remaining concrete floor will be conducted following 761.61(6)(i).
- The grid interval planned for verification sampling is a 3 meter grid interval, as approved by Mr. Juan Thomas of the U.S. EPA, Remediation and Reuse Branch. (Subpart N, 761.265)
- Discrete concrete samples will be obtained at the grid locations following the U.S. EPA "Draft Standard Operating Procedure for Sampling Concrete in the Field", dated 12/20/97.
- Following verification sampling, plans call for employee use of the space in accordance with the definition of "low occupancy space" (40CFR 761.3). No fencing or deed restrictions are planned for this area as elevated PCB impacted concrete will have been removed from the subject property and properly disposed off-site.

2. "You must prepare a cleanup completion summary report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements, including those marked with an 'X' on the enclosure. You must send a copy to me no later than January 10, 2011."

Plans are in place to complete remediation between November 29, 2010 and December 21, 2010 and submit a Cleanup Completion Summary Report to the U.S. EPA no later than January 10, 2011. A tentative schedule indicating commencement and estimated time frame for completion of the cleanup activity has been developed and is attached to this report.

3. "If your cleanup activity includes the use of a fence or a cap that must be maintained in perpetuity, or if any portion of the site is cleaned up to the levels appropriate for low occupancy areas, then you must notify us thirty days prior to any change in ownership of the property. Such notice must include the name, address and telephone number of the new owner, and the name of the new owner's contact person for this matter. You must also submit a letter, signed by the potential purchaser, stating whether it intends to maintain the fence or cap, and whether it plans to maintain the low occupancy land use, or whether it intends to remove and dispose of additional PCB-contaminated soils off-site instead."

Future employee use of the property meets the definition of "low occupancy use", as defined is 761.3. The property will be used by Detroit Mt. Elliott Real Estate, LLC as a warehouse to store metal ingots for the London Metals Exchange. The approximate 313,000 square-foot warehouse will be infrequently staffed, generally having less than ten employees on-site at a time. Employees will spend less than an average of 6.7 hours per week in the area of cleanup. The "low occupancy area" definition also assumes PCB remediation waste will be disposed on-site. For this site, waste will be removed and properly disposed at a licensed solid waste facility. Based on the low-occupancy use and proposed cleanup, there are no plans for a fence or cap in the area of cleanup. Additionally, there are no plans for a change in ownership on the property. The owner intends to remediate the site to more stringent levels, to achieve that of a high-occupancy area.

If you have any questions regarding the information contained within this letter, or if we can be of further assistance, please do not hesitate to contact us.

Very truly yours,

McDOWELL & ASSOCIATES

Christine VanDellen
Environmental Scientist

Douglas M. McDowell, M.S., P.E.
Environmental Manager

CV:DMM/jb

Certification

In accordance with 40 CFR 761.61(a)(3)(E), Detroit Mt. Elliott Real Estate, LLC (current owner of the property and the party conducting the cleanup) and McDowell & Associates (environmental consultant for Detroit Mt. Elliott Real Estate, LLC) certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file at McDowell & Associates' Ferndale, Michigan office, and are available for U.S. EPA inspection.

Detroit Mt. Elliott Real Estate, LLC

Curt Felch

McDowell & Associates

Douglas M. McDowell, M.S., P.E.

cc: Michigan Department of Natural Resources and Environment
Wayne County Environmental Health Department

Attachments:

Attachment I -	Site Location Map
Attachment II -	Tentative Cleanup Schedule
Attachment III -	Map 1 – PCB Wipe Sample Location Map
Attachment IV -	Map 2 – PCB Concrete Sample Location Map
Attachment V -	Map 3 – PCB Concrete and Wipe Sample Correlation Map
Attachment VI -	Statistical Analysis
Attachment VII -	Chemical Test Results

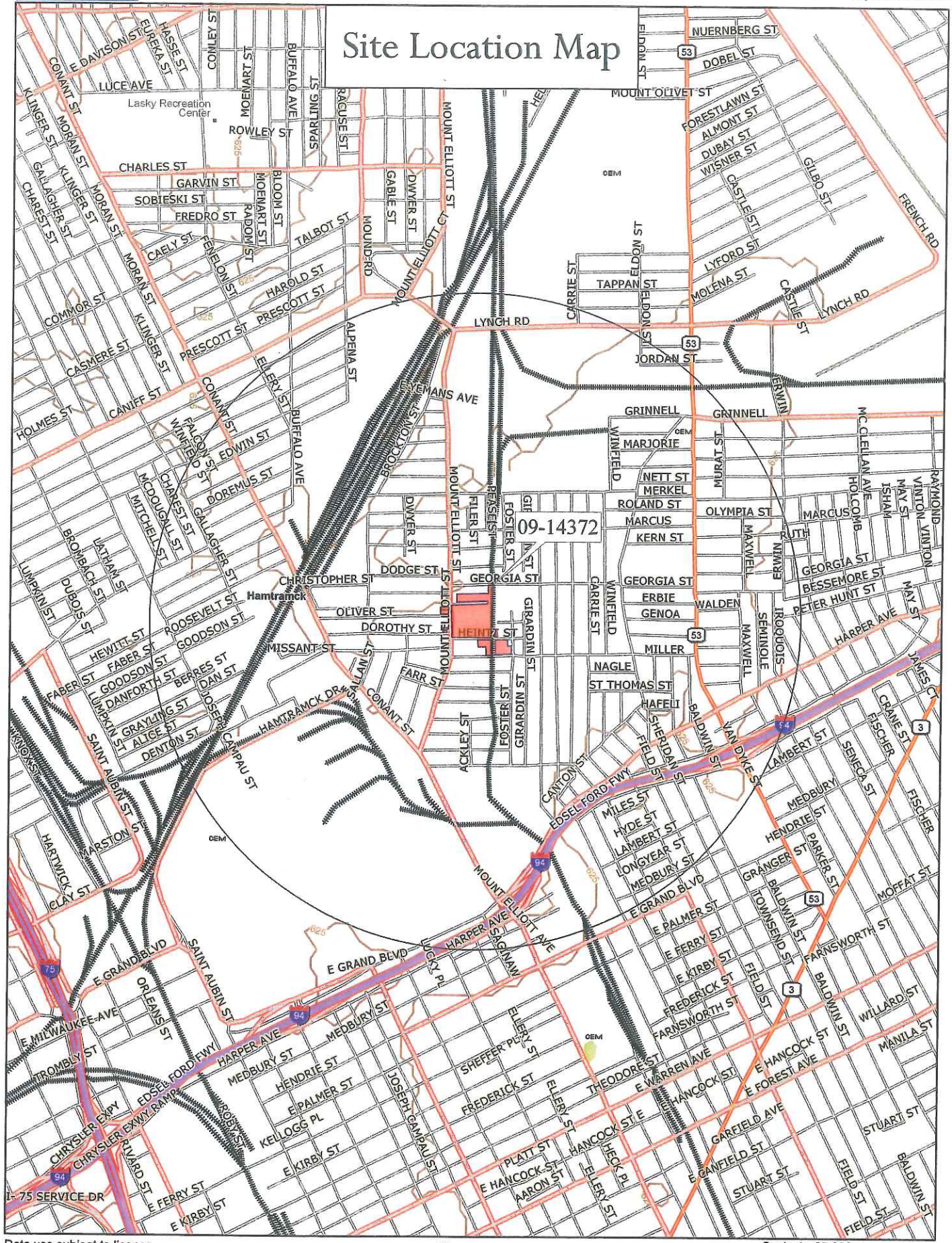
Attachment I

Site Location Map

DeLORME

Topo USA® 6.0

Site Location Map



Data use subject to license.

www.delorme.com

TN

MN (7.3°W)

Scale 1 : 25,000

0 600 1200 1800 2400 3000 ft

0 200 400 600 800 1000 m

1" = 2,083.3 ft

Data Zoom 13-0

Attachment II

Tentative Cleanup Schedule

Tentative Cleanup Schedule

November 29 – December 10, 2010:	Complete on-site cleanup work.
December 10 – December 20, 2010:	Analytical laboratory testing.
December 21 – December 31, 2010:	Disposal of waste off site.
December 29, 2010 – January 6, 2011:	Completion of final report.
January 7, 2011:	Final report submitted to EPA.

Attachment III

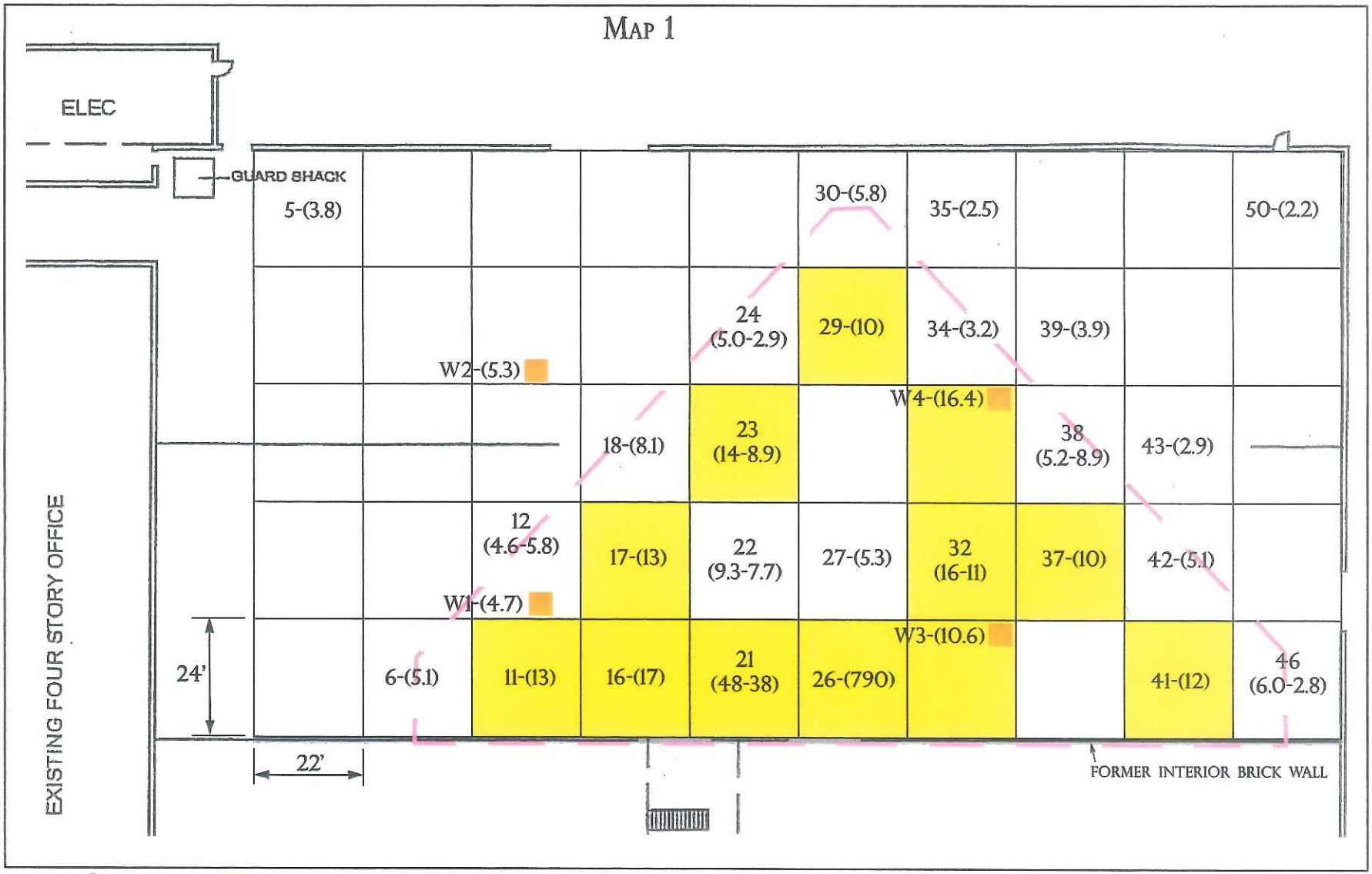
Map 1 – PCB Wipe Sample Location Map

McDowell & Associates

Job Number: 09-14372

PCB Wipe Sample Location Map

Map 1



Legend:

= Grid with PCB wipe sample exceedance

= Samples from 5/29/09 (other samples, obtained from near center of grid, from March 2010)

= Recommended remedial area ~ 9500 sqft.

(__) = Test results (ug/100cm²)

Values shown (__-__) are pre and post washed.

N

1" = 30'